

**ADDENDUM
ENVIRONMENTAL IMPACT REPORT**

**NORTHBLUFF
1389TH ZONING UNIT**

**Livermore Area
Unincorporated Alameda County**

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This Addendum volume, together with the Draft Environmental Impact Report dated November, 1981, constitute the Final Environmental Impact Report for this project.

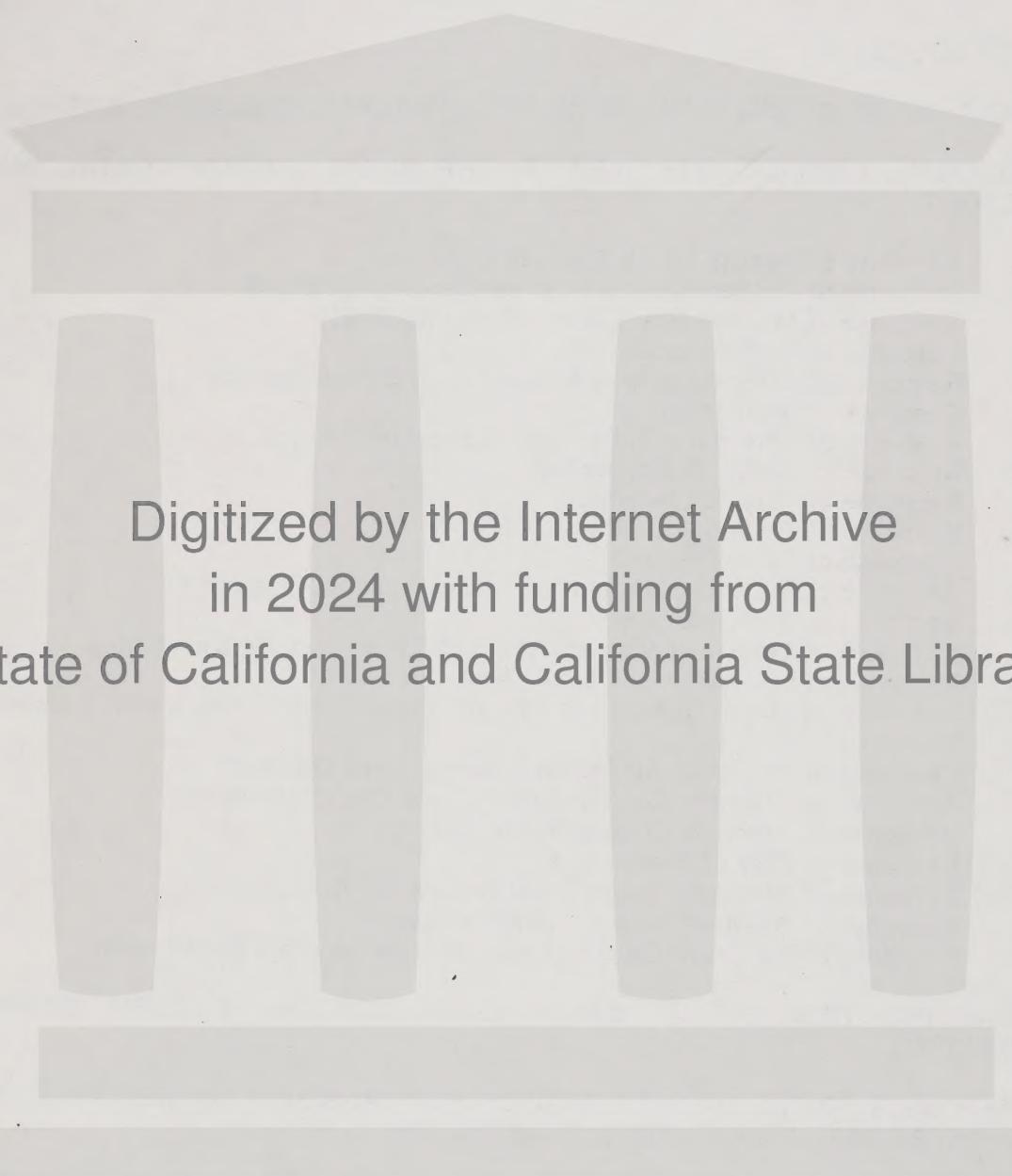
**ALAMEDA COUNTY PLANNING DEPARTMENT
MAY 4, 1982**

ENVIRONMENTAL IMPACT REPORT **VOLUME II**

NORTHBLUFF
BROADMOOR DEVELOPMENT COMPANY
1389TH ZONING UNIT

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I. INTRODUCTION

This document contains errata and changes in the text of the Draft Environmental Impact Report for the Northbluff project, application to rezone to a Planned Development (1389th Zoning Unit), and all responses made on the Draft EIR and Planning Staff Comments to the responses. Republication of the Draft EIR has not been attempted. The Draft EIR together with this document (Volume II) and the changes in the Draft EIR hereby made by this document constitute the Final Environmental Impact Report for the project.

II. ERRATA AND CHANGES IN THE DRAFT ENVIRONMENTAL IMPACT REPORT

A. Table numbers in the Transportation/Circulation section do not coordinate with the text. We apologize for any confusion this may have caused reviewers. The following corrections should be made:

1. Page 22, paragraph 5, Table 3 should read Table 4
 2. Page 26 paragraph 6, Table 4 should read Table 5
 3. Page 27, paragraph 2, Table 5 should read Table 6
 4. Page 31, paragraph 3, Table 6 should read Table 7
 5. Page 31, paragraph 5, Table 7 should read Table 8
 6. Page 44, paragraph 5, Table 10 should read Table 12 and Table 11 should read Table 13.
 7. Page 47, paragraph 5, Table 12 should read Table 14 and Table 13 should read Table 15.
 8. Page 50, paragraph 2, Table 12 and Table 3 should both read Table 14.
 9. Page 50, paragraph 6, Table 12 should read Table 14.
 10. Page 51, paragraph 2, Table 14 should read Table 16.
 11. Page 51, paragraph 3, Table 15 should read Table 17.
 12. Page 55, paragraph 1, Table 16 should read Table 18.
 13. Page 55, paragraph 2, Table 17 should read Table 19.
- B. Page 29 (Table 6): add note: "Ozone standard was changed from .08 to .12 ppm in 1978"
- C. Page 111; paragraph 3, last sentence: the word "received" should read "perceived".
- D. Transit Impacts (New Section - Add to Transportation/Circulation Section)

The existing transit service in the area consists of the BART Express Bus lines and the Local RIDEO bus program. The routes of both these services with relation to the Northbluff site are shown in Figure A.

The BART Express Bus service consists of two lines, the "U" and the "UL" each originating at the BART Bayfair Station just south of the San Leandro Station in the East Bay and terminating at Stanley Boulevard and Murrieta Boulevard station in Livermore. Stanley Boulevard and Murrieta Boulevard station is the major transfer station for the local bus service and the BART Express. The "UL" runs on I-580 passing the Airway Boulevard and I-580 interchange and enters Livermore via the Portola Avenue and I-580 interchange. The "UL" operates on 1/2 hour headways during the morning and afternoon peak periods; no mid-day service is provided on this route. The nearest stop to/from Northbluff on the "UL" bus line is located on Portola Avenue just south of I-580.

The "U" BART Express bus enters Livermore from the southwest via Stanley Boulevard and like the "UL" terminates at the Stanley and Murrieta Boulevard Station. The "U" runs all day with 1/2 hour headways.

The peak hour ridership for the "U" and "UL" lines combined has been estimated at 23 passengers per hour. If a load factor of 1.3 is assumed, the capacity available on the "UL" line is 117 passengers per hour. Also, if half of the demand is assumed on the "UL" line, the demand to capacity ratio on the "UL" line translates into 10 percent or an excess capacity of 105 passengers per hour. The estimated peak hour travel on BART for the Northbluff development has been estimated at 75 passengers per peak hour.

The RIDEO bus service consists of six lines, all of which service the Stanley/Murrieta Boulevard station for transfer to the BART Express buses. There is a bus line that runs to Chabot College to and from the Stanley/Murrieta Station. This service to Chabot College, which is located northeast of the Northbluff site, presently runs along Airway Boulevard and Collier Canyon Road. The service consists of two buses in each of the AM and PM peak periods and a service on a demand basis at night. Ridership on these lines is quite low so considerable excess capacity is available.

Relative to the comments made by Caltrans, City of Pleasanton and City of Livermore, the transportation consultants to the development recommend provision of a Transportation Terminal. A Transportation Terminal would include a Park and Ride lot, Car-pooling and Ride Staging area, drop-off and pick-up area and a bus shelter for the RIDEO bus and BART Express bus service.

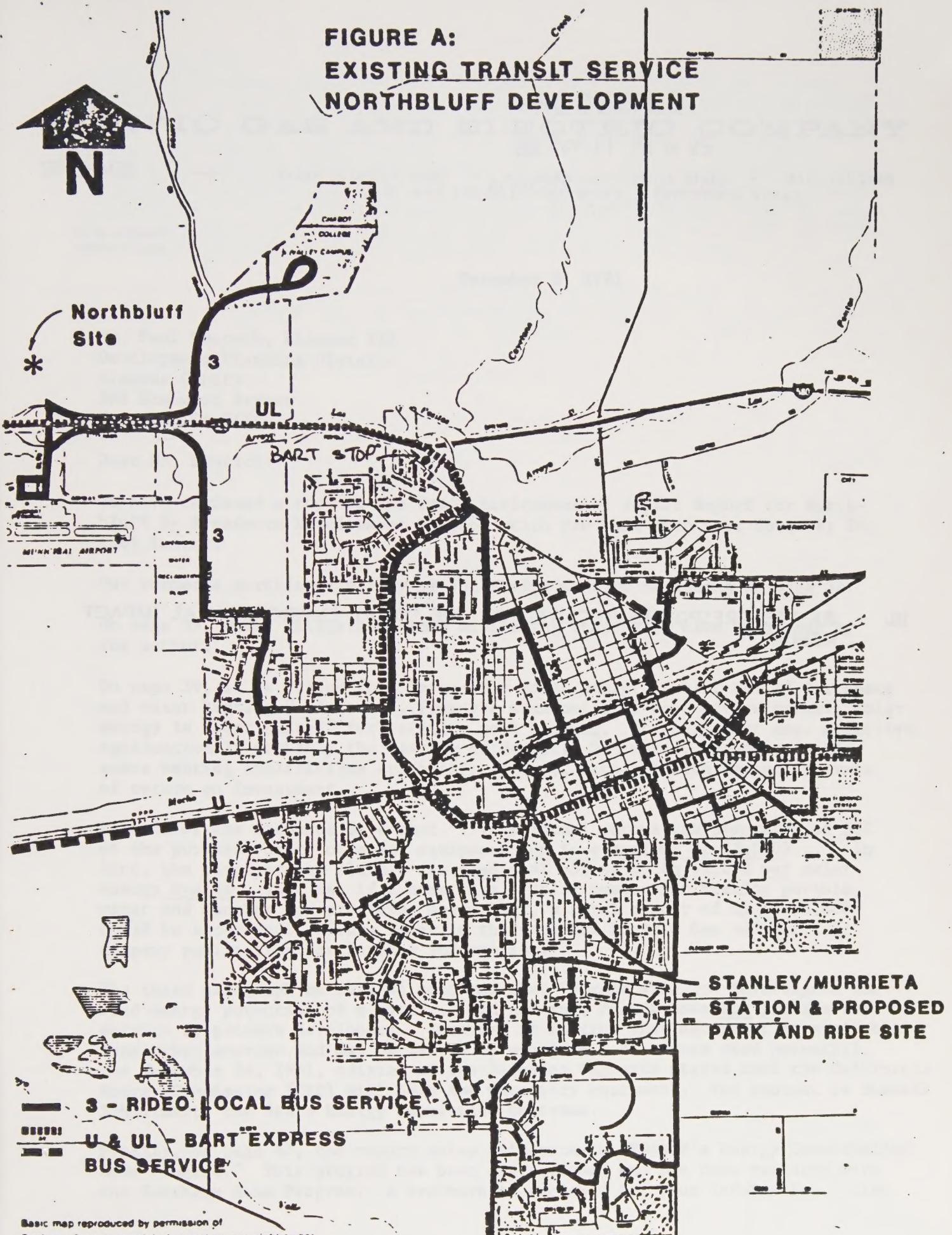
The suggested location of the Transportation Terminal is northeast of the interchange which previously was identified as a Proposed Transit Stop on the Site Plan. The Transportation Terminal's exact location cannot be identified because it is a function of the development of the detailed Master Plan by the selected Developer. Anticipated size of the terminal is 3/4 acre (which could include 45 parking spaces for Park-and-ride Carpool use).

The Transportation Terminal has been discussed informally with BART. BART was favorable toward the concept, however, could not say at this point in time what the most desirable location of Express BART stop may be. It is possible that these stops may be more appropriately located at the interchange at the suggested locations as shown in Figure 4 of the DEIR. In either respect, direct connection between the BART stop and the Park-and-Ride facility should be provided.

The RIDEO system will benefit from the Northbluff project in that with realignment of Collier Canyon Road travel to Chabot College will be more direct and less time consuming. A stop at the Transportation Terminal is proposed. Since the station is along the RIDEO route the impact of the new stop would be to increase by a few seconds when the bus stops at the station.

The above will occur if no additional mid-day RIDEO service is required. There is also a need for mid-day transit service for which there are two options. One would be to expand RIDEO to mid-day service. A second possibility would be to operate a shuttle service to meet the BART Express bus at Stanley and Murrieta Boulevard possibilities. The shuttle service would consist of a mini-bus which travels through the development and stops at the Transportation Terminal. The shuttle service could be operated by the development or by RIDEO.

**FIGURE A:
EXISTING TRANSIT SERVICE
NORTHBLUFF DEVELOPMENT**



III. WRITTEN RESPONSES RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

RECEIVED
PACIFIC GAS AND ELECTRIC COMPANY
1981 DEC 11 PM 4:25

PG&E +

24300 CLAWITER ROAD • HAYWARD, CALIFORNIA 94545 • (415) 783-2380
P. O. BOX 460 ALA HAYWARD, CALIFORNIA 94540
DEPARTMENT

R. C. KISBEY
DISTRICT MANAGER

December 8, 1981

Mr. Paul Deutsch, Planner III
Development Planning Division
Alameda County
399 Elmhurst Street
Hayward, CA 94544

Dear Mr. Deutsch:

We have reviewed a copy of the Draft Environmental Impact Report for North-bluff by Broadmore Development Company which you sent with your November 20, 1981 letter.

Our comments pertain primarily to the Energy section beginning on page 37.

On page 39, under Mitigation, some misleading statements have been made by the author.

On page 39, it is stated that "presently solar energy is best suited for space and water heating." Actually, from the standpoint of cost-effectiveness, solar energy is "best suited" for swimming pool heating. The next most cost effective application is probably the heating of domestic hot water. However, active space heating applications are still, at best, marginal with respect to rate of return on investment.

Page 41 of the document says that "...a personal income tax deduction of 55% of the purchase price of solar equipment (up to a maximum of \$3,000)..." In fact, the taxpayer may claim a tax credit of 55% of up to \$3,000 per solar energy system. That is, if a home uses a solar system for heating potable water and another for providing space heat, a total credit of up to \$6,000 could be recovered. Please refer to the enclosed Pacific Gas and Electric Company publication for further information.

The third paragraph on page 41 mentions that "PG&E will now investigate the wind energy potential of a site..." In general, PG&E does not provide this service to private developers. However, it is true that equipment is available from other sources and may be rented by applicants to assess wind potential. The November 24, 1981, edition of the Berkeley Gazette stated that the California Energy Commission (CEC) will loan the necessary equipment. The contact is Russell Schweikart, the State Energy Commission Chairman.

Finally, on page 42, the report makes reference to "PG&E's Energy Conservation Home Program." This program has been discontinued and has been replaced with the Suntherm Home Program. A brochure is enclosed for your information. Also

Mr. Paul Deutsch

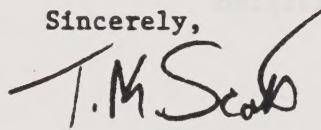
-2-

December 8, 1981

attached is a copy of the "Energy Conservation Standards for New Residential Buildings," published by the CEC. When these standards go into effect on July 1, 1982, they will replace conservation standards that were adopted in 1977 as Title 24. There is no question that these new standards will affect all of the residential structures within the proposed Northbluff project.

Thank you for the opportunity to review and comment on this Draft Environmental Impact Reprt. If you have any questions regarding our comments, please contact me at 783-2380.

Sincerely,



T. M. Scott
District Marketing Supervisor

TMS:11
Enclosures

December 10, 1981

A PETITION

RE: The Draft Environmental Impact Report for Northbluff by Broadmoor Development Company, 1389th Zoning Unit, State Clearinghouse Number 81021006, petition to rezone a 393 acre site from A(Agriculture) to the PD(Planned Development) District, to permit development of 1,750 dwelling units, a 6 acre commercial area, an elementary school, a sewage treatment plant and disposal system, and a recreation center, located north of I-580 between Doolan Canyon Road on the west and Collier Canyon Road on the east, north-west of Livermore, unincorporated Alameda County, California is a comprehensive report.

We, the true residents of Alameda County, residing on Collier Canyon Road agree with the concerns expressed in the EIR report and we ask that the Alameda County Planning Commission be instructed to vote NO in regards to this proposed change in the zoning that would permit the development of this proposed project.

In our opinion this project would be most detrimental to our area and to the valley in general. We understand that the water in our area is the purest in the valley. The well at 2740 Collier Canyon was checked during the summer of 1981 and was found to test the purest water around. We do not want any contamination of our well water to occur. Placing the sewer plant right next to us is a real concern because of the possibility of contamination to our wells. The sewer plant being placed right next to existing residence would guarantee complaints about odors coming from the sewer plant. We are concerned about health, safety and water quality problems.

WE THE UNDERSIGNED REQUEST A NO VOTE ON THIS PROPOSED NORTHLUFF PROJECT.

<u>NAME</u>	<u>ADDRESS</u>	<u>TELEPHONE</u>
Alice M Pettis	7066 Collier Canyon Road Livermore, Cal.F.	447-0376
John S Pettis	7066 Collier Canyon Road Livermore, Calif	447-0376
Anthony Gouvaia	5116 Collier Cyn Rd	447-3758
Denee Gouvaia		"
Mary M Marcel	422 Collier Cyn Rd	447-0172
Mary Ann Miller	3188 Collier Canyon Rd.	447-3972
Jack L Miller	3188 Collier Canyon Rd	447-3972
Patricia M. Waters	2768 Collier Cyn Rd.	449-3624
Robert D. Bachre	2757 COLIER CANYON ROAD	443-5047
Margaret H. Burke	2757 Collier Cyn Rd	443-5047
Stephen L. Waters	2768 Collier Cyn Rd, Livermore	447-3624
Bertine M. Lytton	474 Hwy. 50-W Livermore,	447-2470
Marguerite B. Duran		
Barbara J. Fagan	2690 Collier Canyon Rd. Livermore, Ca. 94551	447-2577
Martha Thompson	NW 74045	089-17

December

ALAMEDA COUNTY PLANNING
DEPARTMENT

REC 24 AM 10 49
1981

RECEIVED

Alameda County Planning Department
399 Elmhurst Street
Hayward, California 94541

Dear Gentlemen:

This letter is in regards to the Northbluff Development,
1389 Zoning Unit, State Clearinghouse Number 81021006.

In reading the Environmental Impact Report, we have come up
with a lot of questions concerning the affects this development
would have on our family and farm.

1) What is to be done about the treated sewage waste water
over spray from the waste water disposal site? From what we
have heard from sources in the area, is that treated waste water
has toxins, which causes plant growth problems. We have
heard that this has caused problems for the Livermore Golf
Course and the tree farm on Doland Road north of the Livermore
Airport.

2) What effect will the over spray have on our farm
animals (cows, pigs, horses, sheep, chickens, etc.), from
eating grasses sprayed with waste water or from breathing
the mist?

3) What effect does sewage waste water over spray have
on people, such as us?

4) What is to be done about the sewage waste water
odor? This can be very annoying at anytime!!

5) We have just had a new well drilled, because the old well
went dry. What assurances can you give us that the waste
water disposal area (evaporation ponds) will not leach
treated waste water into our new water source? Will this
cause nitrates to leach into our wells? We are very concerned
about this!!

In two years we have planted over 30 fruit trees, 50 pine
trees and 20 other various trees, herb gardens, and vegetable
gardens.

We are concerned, because we are the only residents in
Collier Canyon that any sewage problems will affect.

We moved here two years ago to the country to raise our
family and work towards self-sufficiency. We have avoided the
medfly spraying, drought problems, and water quality problems.

We do not want our hard work to be lost, because of these
problems. As you can see any one of these problems can greatly affect
our future here.

We are anxiously awaiting your reply.

Sincerely,

Mr & Mrs Carl F. West

Mr. & Mrs. Carl F. West
4015 Collier Canyon Road
Livermore, California 94550
Phone 449-1945

DKS Associates

Traffic • Transportation • Engineering

December 21, 1981

Principals:

Charles E. De Leuw, Jr., P.E.

William H. Dietrich, P.E.

Larry R. Grove, P.E.

Michael A. Kennedy, P.E.

Hans W. Korpel, P.E.

Richard T. Sauve, P.E.

Daniel T. Smith, Jr., P.E.

Mr. Paul Deutsch, Planner III
Development Planning Division
Alameda County Planning Department
399 Elmhurst Street
Hayward, California 94544

Re: Northbluff Draft EIR

P80037-2

Dear Paul:

We have reviewed the Draft EIR and have the following comments:

1. On page 22, paragraph 5, reference to Table 4 is incorrectly shown as Table 3.
2. On page 26, paragraph 6, reference to Table 5 is incorrectly shown as Table 4.
3. On page 27, paragraph 2, reference to Table 6 is incorrectly shown as Table 5.
4. On page 31, paragraph 3, reference to Table 7 is incorrectly shown as Table 6.
5. On page 31, paragraph 5, reference to Table 8 is incorrectly shown as Table 7.
6. On page 44, paragraph 3, reference to Table 12 is incorrectly shown as Table 10 and reference to Table 13 is incorrectly shown as Table 11.
7. On page 47, paragraph 5, reference to Table 14 is incorrectly shown as Table 12 and reference to Table 15 is incorrectly shown as Table 13.
8. On page 50, paragraph 2, reference to Table 14 is incorrectly shown as Table 12, and again as Table 3.
9. On page 50, paragraph 6, reference to Table 14 is incorrectly shown as Table 12.
10. On page 51, paragraph 2, reference to Table 16 is incorrectly shown as Table 14.
11. On page 51, paragraph 3, reference to Table 17 is incorrectly shown as Table 15.

RECEIVED
1981 DEC 22 AM 10
ALAMEDA COUNTY
DEPARTMENT OF PLANNING
405 14th Street, Suite 610, Oakland, California 94612 - 415/763-2061

Mr. Paul Deutsch
December 21, 1981
Page 2

12. On page 55, paragraph 1, reference to Table 18 is incorrectly shown as Table 16.
13. On page 55, paragraph 2, reference to Table 19 is incorrectly shown as Table 17.

Sincerely,

DKS ASSOCIATES



Hans W. Korve

HWK:sb



Livermore Area RECREATION and PARK DISTRICT

71 TREVARNO ROAD, LIVERMORE, CALIFORNIA 94550

Phone: (415) 447-7300

GENERAL MANAGER
WILLIAM J. PAYNE

BOARD OF DIRECTORS

LOIS M. ELLSAESSER
JOAN TOPGREEN
LESTER JEONOTZ
MARLIN A. DUNN
ERNIE RODRIGUES

December 21, 1981

RECEIVED
DEPT. OF PLANNING
MAY 10 1982
REF. NO. 43

Alameda County Planning Department
399 Elmhurst Street
Hayward, California 94544

Attention: Paul Deutsch

RE: Draft EIR/Northbluff
Broadmoor Development Company

Dear Mr. Deutsch:

The Livermore Area Recreation and Park District Board of Directors reviewed the subject EIR during their regular Board meeting held on December 10, 1981.

The Board desires additional detailed information concerning the developer's proposal as it concerns public park and recreation facilities before a position on the EIR can be taken. The areas of concern, which are discussed below, involve park and recreation facilities needed to service a community of 1750 residential units, park standards and tax revenue projections.

Because the proposed development is located entirely within the Livermore Area Recreation and Park District's boundaries, the Board agrees with the proposal that the District should be the agency to provide public park and recreation services. The Board also agrees with the mitigation measure stated on page 74 of the subject EIR regarding the need for more detail on park site improvements and the developer's intent.

a. Park Standards:

As noted on page 74 of the subject EIR, the park dedication requirement under the Alameda County Subdivision Ordinance is 17.5 acres for a development of 1750 residential units. This is the acreage needed to provide standard neighborhood parks with each park containing a minimum of 5-6 acres. Any dedication of lesser acreage for public park purposes would result in (1) neighborhood parks of a sub-standard size or (2) an inadequate number of properly located and sized parks.

It is not entirely clear how the proposal will provide public parks to satisfy the above cited standard. The District does not necessarily agree with the concept of the developer providing a completely developed 9.6 acre park in-lieu of dedicating the required acreage. In the City of Livermore a Park Development Fee is required in addition to the dedication of land. The funds derived from the Park Development Fee are utilized by the District to construct the standard neighborhood park.

The park land dedication requirement within the City of Livermore is 2 acres per 100 residential units, or 100% more than the County requirement. By permitting the developer to dedicate only 9.6 acres for public park purposes, the Northbluff community when completed will have a neighborhood park density 25% of its next door neighbor. Experience since 1948 has shown that such a low density will not meet the needs of the community. It might be appropriate to consider providing park facilities for the proposed development to the same standards that the District follows within the City of Livermore.

It is also not clear how many public parks are proposed for the development. In certain sections of the study (par. f., page 5; par. 8a, page 89; par. k, page 98; par. c, page 106 and Table 20, page 90) reference is made to a single 9.6 acre park while in other sections (par. c 2 and 3, page 70; par. f, 1 and 2, page 74; and figure 4, Site Plan) reference is made to more than one park. This area needs clarification.

The statement indicating possible negotiations to arrive at reimbursement for a portion of the park improvements (page 74) is not understood and needs further discussions.

b. Tax Revenue Projections:

The revenue projection reflecting tax revenue to be derived for the Livermore Area Recreation and Park District from the project appears to be very optimistic. The Board desires a detailed breakdown showing how the build-out revenue of \$229,040 (page 101) for LARPD was determined.

The Board also questions the validity of the maintenance cost projection of \$58,000 and the net surpluses ranging from \$48,090 to \$171,040. These projections are based on providing only 9.6 acres for a neighborhood park. This acreage is 50% below the minimum desired standard acreage and therefore is inadequate to meet the needs of a community of 4500-4800 people. Increasing the acreage to meet the County parkland dedication requirements would increase the maintenance costs and reduce the so called surplus.

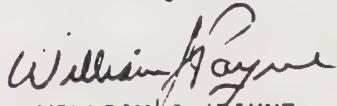
It is recommended that representatives from LARPD, County Planning Staff, and the developer meet to discuss the above mentioned points, specifically addressing:

Alameda County Planning Department
December 21, 1981

-3-

- a. Parkland dedication requirements for the project.
- b. Numbers and location of park sites.
- c. Development of park sites.
- d. Tax revenue projections and maintenance costs.

Sincerely,


WILLIAM J. PAYNE
General Manager

NJP:pak

RECEIVED

1982 JAN 24 AM 9:43

ALAMEDA COUNTY PLANNING
DEPARTMENT

1334 Kathy Court
Livermore, California
December 30, 1981

Mr. Paul Deutsch
Alameda County Planning Dept.
399 Elmhurst Street
Hayward, California 94544

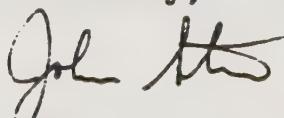
Dear Mr. Deutsch:

I have read the Draft Environmental Impact Report including the Lowry and Associates report on sewage disposal. It appears that the reverse osmosis portion of the report is very sketchy.

The part of the EIR dealing with brine disposal seems incomplete. Where will the 330,000 pounds per day of brine be dumped? What are the possible impacts of the 3 acre brine storage ponds? What facilities will be needed to load and empty the trucks? What is the impact of five or six round trips per day of very large trucks, and what is their energy use? These questions should be answered.

The technology of reverse osmosis is new and relatively unproven on this scale. Considering the possible large and unmitigatable effects of a failure a trial operation would be advisable before the project is built. The back end of the plant (RO and land spray) could be built and run for a year on effluent from the Livermore plant to test the system.

Sincerely,



John Stein



EDUCATION CENTER
685 LAS POSITAS BOULEVARD • LIVERMORE, CALIFORNIA 94550 • TELEPHONE 447-2500

December 22, 1981

Paul Deutsch, Planner III
Development Planning Division
Alameda County Planning Department
399 Elmhurst Street
Hayward, California 94544

Dear Mr. Deutsch:

This is in response to your letter of November 20, 1981, which asked for comments on the Draft Environmental Impact Report for the Northbluff development.

1. On Page 3, the total number of students shown in Table I, 850, is not consistent with the total number of students shown on Page 69.
2. On Page 70, the following statement appears:

"Construction of a new school on the site at the same time the School District is faced with closing schools located closer to central Livermore would be an inefficient use of resources."

This statement is not true. A reasonable relationship cannot be drawn between the need for a school in the Northbluff area, and the closing of a school in the City of Livermore. It is not practical to require elementary school children to travel to a school site many miles from their neighborhood, across a major freeway. The paragraph immediately preceding the quoted paragraph on Page 70 of the report adequately explains why a school site in Northbluff is needed, irrespective of the closing of schools in the City of Livermore. The quoted paragraph above should be deleted from the report.

Other than the above, the draft report adequately reflects the school requirements that will result from the Northbluff project.

Very truly yours,

R. F. D'Ambra
Director of Facilities Management

dm

RECEIVED
1982 JAN -7 AM 10:25
ALAMEDA COUNTY PLANNING DEPARTMENT

RECEIVED

December 30, 1981

1982 JAN -1. AM 9:40

ALAMEDA COUNTY PLANNING

Mr. Paul Deutsch DEPARTMENT

Planner III

Alameda County Planning
Department

399 Elmhurst St.
Hayward, Ca. 94544

Dear Mr. Deutsch:

As requested, I have reviewed the Draft Environmental Impact Report (DEIR) prepared for the proposed Northbluff Project. The purpose of the review was to determine whether geologic and seismic hazard data submitted for the DEIR have been accurately incorporated in the document and related physical impacts adequately assessed.

After a thorough review of the DEIR, it is my professional opinion that pertinent geologic and seismic hazard data has been accurately incorporated in the document and that related impacts are adequately assessed except as noted below.

As the DEIR states, longer term impacts associated with the operation of the proposed sewage treatment plant are uncertain because of the limited information concerning sustained performance of similar systems. The proposed reverse osmosis facility will remove much of the salt load from the wastewater stream thereby reducing possible effects of salt buildup in the spray disposal areas. However, a gradual accumulation of salts other than nitrates is likely with time because of the properties of the formations underlying the planned spray disposal areas. Adverse effects upon plant growth could follow leading to reduced nitrate uptake.

As a partial mitigation for this potential problem, it is suggested that the water quality monitoring system described in the DEIR be expanded to include periodic soil sampling and analysis within spray disposal areas, in order to provide early warning of adverse geochemical changes. Zone 7 personnel might provide professional overview of the monitoring system as part of their water quality protection responsibilities for the Livermore Valley area.

Page 2

Sampling and analysis should be done by qualified geotechnical and laboratory consultants retained by the proposed sewage disposal agency. Costs should be paid by Project property owners.

Very truly yours,

David W. Carpenter

David W. Carpenter
Engineering Geologist

ADMINISTRATION BUILDING
1052 South Livermore Avenue
Livermore, CA 94550
(415) 449-4000

DALE TURNER
Mayor

January 4, 1982

Alameda County Planning Commission
399 Elmhurst Street
Hayward, CA 94544

Re: Northbluff Draft
Environmental Impact Report

Dear Commission Members:

The City of Livermore wishes to take this opportunity to present our comments on the Draft Environmental Impact Report for the Northbluff project. We will first address specifics in the Draft Environmental Impact Report and then make general comments that relate to the project's impact.

Comments on Specific Impacts

1. The developers have indicated that a reason the project must be approved is that it will provide the County with much needed affordable housing. The housing cost breakdown on Page 3, however, indicates that only 13 percent of the 1,750 units will sell for under \$100,000, and these are not scheduled to be built until 1987-88 and 1988-89. Conversely, 34 percent of the housing units in the development will be priced at over \$125,000. Those that are priced at over \$150,000 are the first units scheduled to be built. These units are scheduled to be built in 1982-83 and 1983-84.
2. The estimate of taxes and fees to be paid by the homeowners--Table 2, Page 5--is more than a homeowner in Livermore would pay on a similar type home. This would tend to make homeownership even less achievable for those needing affordable housing.
3. Air Quality - We are concerned over the project's impact upon air quality in the Valley. The mitigation measures listed on Page 36 do not alleviate the fact that because of the project's location significant automobile travel is going to be needed to get to schools, shopping centers, places of employment, and entertainment, etc.
4. Transportation and Circulation - It is not reasonable to assume that the energy required for transportation will be reduced because

January 4, 1982

of a BART extension out to the Livermore-Amador Valley (Page 42). A BART extension out to the Livermore-Amador Valley is still a long-term possibility.

The discussion concerning Transportation and Circulation (Page 43 - 61) should include consideration as to how the major streets in the development would connect with the City's circulation system. Further, this section makes no mention of the City of Livermore's public transportation system--RIDEO--which could impact upon the proposed development since RIDEO already has a line going right through the proposed project serving Chabot College.

Sewage Disposal - The discussion concerning Sewage Disposal (Pages 62 - 69) assumes that all subsystems will work exactly as planned. Little, if any, provision is made for a backup system, if needed, in case of emergency. Mention is made on Page 69 of an emergency connection to the existing Livermore plant, but no arrangements have been made with the City of Livermore to provide for this connection.

Schools - Page 70 discusses the need to construct an elementary school within the project boundaries despite the fact that there are elementary schools being closed in the Livermore Unified School District. Additionally, those youths living in the proposed project area that need to attend intermediate or high school will be required to travel over four miles to a school site. No school bus transportation presently exists to serve the proposed development, and none is contemplated in the future.

Police Protection (Page 71) - Given the low level of staffing of patrol areas by the Sheriff's Department, it can reasonably be expected that requests for assistance from the Livermore Police Department would increase. The Draft Environmental Impact Report on Page 71 mentions that the City already provides more service to the County than the County provides to the City. If the existing mutual aid imbalance is worsened, the traditional concept of mutual aid could be in jeopardy. No arrangements have been made with the City of Livermore to provide additional backup support service.

Fire Protection (Page 72) - The Draft Environmental Impact Report provides for a fire station to be built during the third year of build-out. Fire protection is needed from the beginning of the first construction phase. The City already provides more service to the County than the County provides to the City. If the existing mutual aid imbalance is worsened, the traditional concept of mutual aid could be in jeopardy. No arrangements have been made with the City of Livermore to provide additional backup support service.

The City of Livermore has one fire station for every 4,000 dwelling units. The proponents of the project propose one station to serve 1,750 dwelling units. This is an inefficient use of resources and the costs for providing the service will have to be borne by residents of the proposed development.

9. Airport Noise (Page 79) - The Draft Environmental Impact Report indicates the proposed development would experience noise impacts from the Livermore Airport. Aircraft would fly over the areas both for landings and takeoffs. No significant measures are offered to mitigate this impact.
10. Control of Urbanization and Responsibility for Services (Page 83) - The Draft Environmental Impact Report should state that the Northbluff project does not conform to the objectives in the County's General Plan that all urban development shall be within incorporated areas. Further, mention should be made that the County's General Plan states that the County will discourage the establishment of special districts that provide public services to urban development. The Northbluff project is in conflict with the stated objectives of the County's General Plan.
11. Local Agency Formation Commission (Page 85) - Existing Local Agency Formation Commission (LAFCO) policies state that urban development should be located within cities. LAFCO has violated its own policies by allowing the Northbluff proponents to proceed with their development project outside of an established City government. LAFCO's actions could lead to an inefficient use of governmental resources which will place a greater burden on the taxpayers.
12. Association of Bay Area Governments (ABAG) Regional Plan (Page 86) - We would agree with the statement that the Northbluff project would potentially be in serious conflict with the regional policies. Further, if the County subsequently approves the proposed Las Positas project there will be a serious jobs-residence imbalance within the Valley. This imbalance will create additional energy, air quality, and transportation problems because of the distance Valley residents will have to travel to employment centers.
13. Federal Revenue Sharing (Page 103) - The statement is made that revenue sharing for cities and counties has strong political support and can be expected to continue. Recent news releases, however, indicate that the current administration may reduce revenue sharing for cities and counties and this position has some political support.
14. Annexation to Livermore, Development as Proposed (Page 111) - The statement is made that residents in the City of Livermore's Springtown area receive a chronic shortage of City services because of their

January 4, 1982

relative isolation. This statement is not factual, as residents in the Springtown area receive services comparable to those received by other Livermore residents. The services provided to the Springtown residents are more efficient and economical than those that would be provided Northbluff residents by a County Service Area.

General Comments on Project's Impact

The City of Livermore has consistently taken the position that the Northbluff area should not be developed as residential. Some of the major points raised in our previous Position Summary and Analysis are confirmed in the Draft Environmental Impact Report. As proposed, some of the municipal-type services provided to the development would be done so through formation of a County Service Area. Other services would have to be provided by existing County departments or through contracts with other units of government. What this means is that the future residents of the area will have to rely upon receiving local services through a number of different units of government each of which is unique in its own service delivery methods and procedures. Fragmenting municipal-type services in this manner leads to inefficient services delivered at a higher unit cost. The Northbluff residents in particular and all County tax payers in general will be the recipients of these higher costs.

One of the major arguments put forth by the proponents of the Northbluff project in support of residential development built independent of local control is that there is a critical need for housing in the Livermore-Amador Valley area, and that both the Cities of Pleasanton and Livermore have current policies which restrict the number of housing units that can be built. The fact is that between the two Cities, approvals have been given as of January 1982 to build approximately 2,700 housing units--none of which have yet been started. It has been primarily the economic situation and not governmental policies which have prevented these housing units from being built. Many of these units will be affordable to low and moderate income families. Further, the City of Pleasanton is seriously considering eliminating their housing restriction policies and the City of Livermore is currently studying the need to change our housing limitation policies. Both of these actions have come about because there is concern in both communities about the need to assure an adequate supply of housing to all income levels.

The Draft Environmental Impact Report points out a number of significant impacts which cannot be mitigated. Most of these unmitigable inputs could be lessened or eliminated if the Northbluff project were to develop as industrial, or if it developed under the control of the City of Livermore where the infrastructure already exists to provide efficient urban-type services.

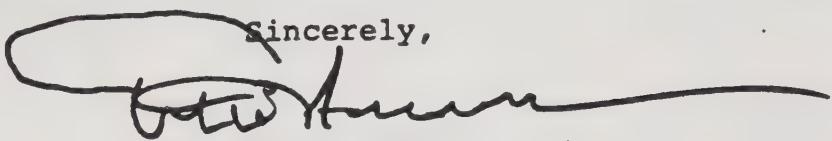
Alameda County Planning Commission
Hayward, CA

-5-

January 4, 1982

Thank you for the opportunity of allowing us to comment on the
Draft Environmental Impact Report.

Sincerely,



DALE TURNER
Mayor

141 Via Sorena
Alamo, Calif. 94507
Jan. 6, 1982

Alameda County Planning Dept.
399 Elmhurst Street
Hayward, Calif. 94544
Attn. Adolph Martinelli

Dear Sirs.

This letter is in response to your Notice of Public Hearing in the matter of the petition of the Broadmoor Development Co. for a reclassification of the land proposed for its Northbluff project. I am writing you on behalf of the Doolan Road Partnership. We own the 89 acre parcel bordering the proposed Northbluff project due west for a distance of about 1800 feet at the northernmost portion. Our land is due north of the Grindout-Lopez parcel. As you know the first public hearing was held on Dec. 21, 1981 and the second on Jan. 4, 1982. The comments and queries below voice the concerns of the Doolan Road Partnership.

First we call you to note that our land is suitable only for grazing at the present time and the grazing fee just about covers the property taxes with little to spare. In addition the Federal Aviation Agency has regulations limiting construction on the basis of maximum altitude in the vicinity of an airport. Our land exceeds these limits except for a few acres in the immediate vicinity of Doolan Rd. These conditions will make understandable the following points and concerns:

1) How are we to be protected from additional assessments which may arise with the setting up of a special CSD (Community Service District) or CSA (County Service Area)? Such an entity is clearly intended to benefit the local residential area; it is totally irrelevant to a grazing area.

2) In your April 20, 1981 letter to us you mention the possibility of the proposed project influencing future land-use decisions on our property. This too is another ominous as the change of our land from the agricultural preserve status to anything else would make our

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ALAMEDA COUNTY PLANNING
DEPARTMENT

for burden completely unbearable. How are we protected in this case?

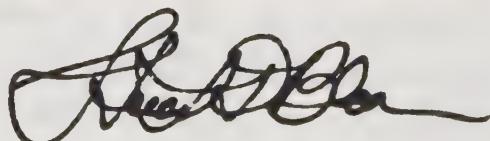
3) I (S. D. Bloom) attended the Dec. 21, 1981 hearing at which time it became very clear that Broadmoor's plans for a local tertiary sewage treatment plan are very much in the developmental stage. Of particular concern to us is the plan to spray the treated effluent from a source located in the northwester part of the project, i.e. due east of us. Considering the unproven nature of the sewage plan how are we to be protected from possible damage from such an effluent spray right in our immediate vicinity?

4) We would be grateful to learn what provisions there are in the Laramore Arador Valley planning unit of the General Plan, regarding our land. From the proceedings of Dec. 21, 1981 it was clear that the Northbluff project land has been designated as appropriate for PD (Planned Development). From the above it is obviously of some importance to us to learn what the planned designation for our land is, considering it borders right next to the Northbluff land.

We would be deeply appreciative of your earliest convenient response in the matters discussed above as well as such other guidance and information you deem appropriate.

Yours very truly,

For the Doolan Rd. Partnership,





the SUTHERLAND company
44808 Grimmer Blvd., Fremont Ca 94538
(415) 490-3490

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1982 JAN -8 PM 12:05

ALAMEDA COUNTY DEPARTMENT OF PLANNING

January 6, 1982

TO: William H. Fraley, Planning Director
FROM: Sid Sutherland, Planning Commissioner
RE: NORTHBLUFF EIR

In response to your letter please find herewith my comments. On January 4, 1982 several items came up for which I would like to see additional information contained in the final EIR presented to this Commission.

SEWAGE TREATMENT

I found the testimony on the sewage treatment system confusing. In the EIR the staff raised concerns about threats to the ground water basin from operation or failure of the sewage treatment system. Some area residents also mentioned this concern. Yet at the January 4 workshop the Zone 7 Manager read from a letter stating that the Regional Water Control Agency had given a preliminary approval of the proposed treatment system. This would seem to suggest that the threats have been exaggerated. First, I think that the Regional Water Agency's letter should be included in the EIR. Second, their opinions should be given at least equal weight to those of the staff in the EIR.

It is my understanding that the City of Livermore uses treated sewage to water the grass at their Las Positas Golf Course. I think it would be appropriate for the EIR to: (a) Compare Livermore's demineralization systems to the Northbluff proposal;

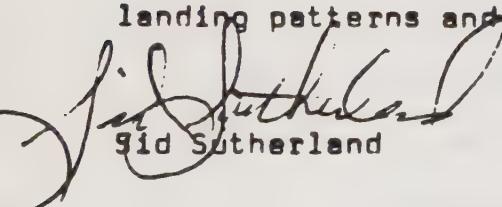
2.

(b) Compare Livermore's impact on the ground water to that expected from Northbluff; and (c) Compare the risks of failure of Livermore's Treatment Systems (on the ground water or on the Bay through the export pipe line) to the risks of failure at Northbluff.

The Staff has made much of some liability to the County due to creation of a CSA or CSD to operate the sewage treatment system. I am not aware of any such calamities where the County has had to accept legal or political responsibility for a portion of the costs. Have there been any?

AIRPORT

At the January 4 Work Session the issue of the nearness of the airport to houses in both Northbluff and in the City of Livermore came up. I think that the discussion of the closeness of the airport to the proposed Northbluff project would have more meaning to us if the discussion compared it to the closeness of housing to the airport in Livermore, contrasting their relationships to landing patterns and airplanes altitudes as well.


Sid Sutherland

cc: Don Excell

Memorandum

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To : Ann Barkley, Chief
Division of Transportation Planning PH 12:02
1982 JAN 8
Attention F. D. Husum ALAMEDA COUNTY PLANNING
DEPARTMENT

From : DEPARTMENT OF TRANSPORTATION-District 04
Environmental Planning

Subject: Caltrans District 04's comments on the Draft Environmental Impact Report (DEIR) for Northbluff Development, Livermore. County of Alameda is the Lead Agency.

Date: January 6, 1982

File: 04-Ala-580 PM 15.0+
SCH #81021006

THIS COPY FOR

Paul Deutsch,
Planner III

1. Caltrans has neither plans nor funds budgeted for future improvements to Interstate Route 580, in the Livermore area, to handle additional traffic.
2. Traffic Diagrams #5 and 6: The proposed additional lanes and new loop look feasible. The only drawback is the unsymmetrical interchange. However, for the small traffic volumes (30 AM and 210 PM), a new eastbound diagonal on-ramp to make it symmetrical probably could not be justified.
3. Traffic Diagrams #10 and 11: There are not enough lanes to handle the PM peak-hour volumes. The eastbound off-ramp should have a triple left turn instead of a double left. The northbound Airway Boulevard approach to the off-ramp and Airway Boulevard intersections should have three through lanes instead of two shown.
4. Southbound Airway Boulevard through the interchange needs only one lane, not two as shown on Traffic Diagram #10.
5. DEIR, page 53: Project Developer should provide specific area for Car-pooling and Ride Sharing staging area within the Projected Local Commercial Area Parking Lot.
6. Sections III-D-2-b and c (1986 Traffic Impacts, and Mitigation), and III-D-2-d and e (Future Traffic Impacts - Year 2005, and Conclusions of Analysis) address these subjects in much detail and their assessment of impacts appear to be reasonable.
7. The envisioned 1986 mitigations would include major realignments and additions to the I-580 and Airway Boulevard Interchange, while their year 2005 traffic projections (which would include traffic generated by the proposed new town of Los Positas, population 40,000 to 45,000) would necessitate additional ramps, structure widening and a complete new full interchange on I-580.

Barkley/Husum
Page 2
January 6, 1982

8. The DEIR does not clearly describe the funding arrangements for the proposed additions to the State highway system. We will not finance any project-related mitigation measures. Any work within the State highway right of way needs to be adequately described; the work must be evaluated for possible significant environmental consequences, and such work will be subject to our encroachment permit process.
9. DEIR, page 5: It is not clear whether the "urban infrastructure" is intended by the proponents to include parts of the (Inter-) State Highway System. It is therefore suggested that the EIR specifically address the funding mechanisms for these improvements.
10. A detailed review of the traffic projections is not warranted at this time. Such a study--including possibly an operational analysis--should be made if and when contemplated interchange improvements enter our planning stage.
11. DEIR, page 88: Recognizes that the project appears to fall outside the priorities of the "California Urban Strategy," that an encroachment permit and other State agency approvals may be required, and that the project runs counter to "California Urban Strategy" policies. Please note that we are bound to consider the "Urban Strategy" when evaluating requests for transportation improvements, and will have serious concerns regarding the issuance of encroachment permits.

Mr. Paul H. Hughes is the contact person for our agency, and is available at the following address:

Paul H. Hughes
Acting District CEQA Coordinator
Caltrans District 04
P. O. Box 3366, Rincon Annex
San Francisco, CA 94119

Should you have any questions concerning these comments, please contact Ray Duggal of my staff at (415) 557-2830.

for *Ray Duggal*
PAUL H. HUGHES
Acting District CEQA Coordinator

cc:(i) State Clearinghouse
(ii) Paul Deutsch, Planner III
Development Planning Division
Alameda County Planning Department
399 Elmhurst Street
Hayward, California 94544

WILSEY & HAM

Earl P. Wilsey (1892-1957)

1035 E. Hillsdale Blvd./Foster City, CA 94404
(415) 349-2151

Mailing Address: P.O. Box H
San Mateo, CA 94402-0099

4-587-0106

January 11, 1982

Paul Deutsch
Development Planning Division
ALAMEDA COUNTY PLANNING DEPARTMENT
399 Elmhurst Street
Hayward, California 94544

Re: Comments on the Northbluff DEIR

Dear Mr. Deutsch:

Wilsey & Ham, on behalf of the Las Positas Land Company, has concluded its review of the Northbluff DEIR. We are currently preparing a General Plan Amendment Application for a 4,275-acre mixed-use development in the Las Positas Valley, immediately east of the proposed Northbluff project. We have the following comments:

Air Quality

1. The assumptions contained in the Mitigation (pg. 36) appear to be accurate based on data and analysis being prepared for the Las Positas proposal, i.e., a housing shortage will exist in the Valley because of rapid employment growth, and the proposed project will result in a reduced VMT when compared to the no-build alternative.

Transportation/Circulation

2. The trip generation factor assigned to Las Positas, 9 trip-ends per unit day (see pg. 56 of DEIR), appears to be over-estimated for a development, like Las Positas, with a high percentage of multi-family residential units. We will be preparing our own analysis of Las Positas trip generation characteristics in the weeks ahead. We will also re-evaluate the trip distribution characteristics of the development.
3. The Northbluff analysis appears to neglect any effect of transit usage for Las Positas. As public transit will be an important component of our development plan, this could have a significant effect on the traffic analysis.
4. The Northbluff report concludes (see pgs. 58-59 and pg. 61) that interchange improvements at I-580 and Portola Avenue will be required with Las Positas in order to mitigate the impact of the project on the Airway Boulevard interchange. We believe this finding is premature at this point because a system-wide analysis of the freeway interchanges connecting to Las Positas has not yet been prepared (this will be done as part of the Las Positas study). The Portola Avenue interchange would not need to

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ALAMEDA COUNTY PLANNING
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Mr. Paul Deutsch
January 11, 1982
Page Two

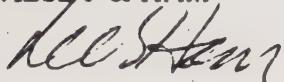
provide access to Las Positas unless the other interchanges to the east are also projected to reach capacity. Even if capacity conditions are projected for these other interchanges, it may be more cost-effective to upgrade interchanges other than the one at Portola Avenue (existing topography may be one of the factors which preclude the upgrading of this interchange).

We suggest that any specific recommendations for interchange improvements needed for the Las Positas development be deleted from the Northbluff EIR. The impacts and necessary mitigation measures resulting from Las Positas will be identified in our forthcoming analysis.

Thank you for the opportunity to comment on the Northbluff DEIR.

Very truly yours,

WILSEY & HAM



LEE E. HAM
President

LEH/sjr/W-1



LEAGUE OF WOMEN VOTERS OF LIVERMORE-AMADOR VALLEY
Post Office Box 702. Livermore, California 94550 (415) 455-0800

January 11, 1982

Alameda County Planning Commission
399 Elmhurst
Hayward, California 94544

Re: Northbluff Development

Dear Commission Members:

The League of Women Voters of the Livermore-Amador Valley has read the EIR on the proposed Northbluff development. We oppose such a development at this time because we believe it is a leapfrog development which will contribute to urban sprawl with its attendant problems of air pollution, more costly urban services, loss of viable agricultural land, less visible government and possible groundwater degradation, a unique concern of our valley.

The League is on record (letter to LAFCO, 8/18/81) favoring the City of Livermore's efforts to plan for this area because we believe that growth should be orderly and contiguous to existing municipal entities. As an established city, with a full range of municipal revenues, Livermore can plan for and offer needed urban services more efficiently and economically. In addition, Livermore has made significant efforts to provide affordable housing as well as commercial and industrial areas for its citizens. We would also like to stress that city government is more accessible to the people than that of a County Services Area.

Since the City of Livermore thus far cannot plan for the Northbluff area, we urge the County to adhere to planning policies which discourage leapfrog developments like Northbluff and which encourage orderly municipal growth.

Sincerely,

Mary Ann Hannon

Mary Ann Hannon
Local Action

Carol Lathrop/mab
Carol Lathrop
President

cc: City of Livermore
Supervisor Excell

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1982 JAN 12 AM 9:04
ALAMEDA COUNTY PLANNING
DEPARTMENT

January 11, 1982

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1982 JAN 18 AM 7:57

Mr. Adolph Martinelli
399 Elmhurst Street ALAMEDA COUNTY PLANNING
Hayward, California 94541 DEPARTMENT.

Dear Mr. Martinelli;

We are writing this letter to ask you what your position is on the proposed Northbluff Development project north of highway 580, between Collier Canyon Rd. and Doolan Rd?

Also to ask you some questions regarding our problems with the proposed Northbluff Development.

Our first question is, why would the county let a residential development be built in an area which is better suited for agriculture or small farms? There are other areas in and around the city of Livermore that are better suited for this type of residential development, where major services would be better provided on the southside of highway 580.

The people who now live on Collier Canyon Rd. for many years have enjoyed the farm country atmosphere. If this residential development is allowed it will destroy this atmosphere. This is the reason why we moved out of the city.

We believe there will be problems from the residents of the Northbluff Development for the residents now living on Collier Canyon Rd.

I don't know why Alameda County would let a sewage treatment plant spray effluent waste water on the hills behind the development? This could put our own wells in jeopardy.

There have been no guarantees from the Northbluff Development Company saying this will not affect our property value, animals and crops and ourselves.

Our property borders the sewage waste water disposal site on the west and north sides. This will effect our property values, animals and crops.

As you can see we are directly affected by the decisions of the county supervisors on this development. This will have long lasting effects on our family and others to come.

We anxiously await your reply. As we are very concerned.

Sincerely,

Mr & Mrs Carl F. West

Mr. & Mrs. Carl F. West
4015 Collier Canyon Rd.
Livermore, California 94550



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

1404 CONCANNON BOULEVARD • LIVERMORE, CALIFORNIA 94550 • (415) 443-9300

INTER-DEPARTMENT COMMUNICATION

DATE: JANUARY 12, 1982

TO: WILLIAM H. FRALEY, PLANNING DIRECTOR

FROM: MUN J. MAR, GENERAL MANAGER, ZONE 7

SUBJECT: REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT,
NORTHBLUFF DEVELOPMENT (S.C.H. #81021006)

We have reviewed subject EIR and would appreciate your consideration of the following comments:

1. Section III.B.2.c., page 19, paragraph 2: Improvement to Collier Canyon Creek required by Zone 7 would normally be done under agreement with the developer and the resultant channel would thereafter be maintained by Zone 7.

2. Section III.B.2.c., page 19, paragraph 3: Because of the potential cost to the public of channel cleanout work which could be necessitated by inadequate erosion control during grading on the site, we wish to support the recommended requirement of an erosion and sediment control plan and related measures proposed in the EIR.

3. Section III.D.3.b., pages 62-69: The proposal of the Northbluff developer to provide a discrete sewerage system including the demineralization of the treated sewage for disposal on land, in concept, conforms to an interim standard of our agency for the quality of applied treated wastewater on land. While this may be a feasible approach to deal with the sewerage problem of this proposed development, it is but a third choice to handle sewage in the valley in the opinion of our consultant, Camp Dresser & McKee Inc. (CDM) of Walnut Creek. Their interim report of November 24, 1981, strongly advised that sewage from Livermore Valley could best be handled by exportation of the treated sewage from the valley. Exporting treated sewage via a pipeline (similar to the LAVWMA pipeline) would more effectively remove salts from the valley, use less energy when compared to demineralization, and would be more reliable. The viability of an export pipeline proposal from an institutional and financial standpoint is being investigated and conclusions will be forthcoming soon. If sewerage service including exportation of the wastewater can be provided for the Northbluff proposal, there could be financial and other advantages to the developer and the future residents of the area.

Accordingly, we concur with the DEIR (page 68) that consideration be given to await our wastewater management study results before commitment is made

William H. Fraley
Planning Director

- 2 -

January 12, 1982

on the proposed sewerage plan so that the alternatives including sewage treatment, demineralization and land disposal, under investigation could be fully explored and conclusions reached as to the best solution from a valley-wide standpoint. Approval of the proposed wastewater management system for Northbluff at this time will preempt the results of our study. We expect our study process to be concluded within the next five months.

Thank you for the opportunity to comment on your DEIR.



MUN J. MAR
GENERAL MANAGER

MJM:bkm
cc: Zone 7 Directors

AIRPORT LAND USE COMMISSION
STAFF REPORT - JANUARY 13, 1982

Review of Draft Environmental Impact Report, Proposed Northbluff Residential Development, Livermore Area, Unincorporated Alameda County

Recommendation:

It is recommended that the ALUC review this staff report and conclusions, add any additional concerns that should be addressed in the Final EIR, and direct staff to transmit this report to the Alameda County Planning Department.

Background:

The Alameda County Planning Department is Lead Agency for the project and prepared the Draft EIR (DEIR) which has been distributed to concerned agencies for comment prior to preparation of the Final EIR. At its March 11, 1981 meeting, the ALUC approved an ALUC staff report that listed concerns to be addressed in the EIR. The response was transmitted to the County Planning Department.

Project Description:

The site of the proposed project is 393 acres immediately north of I-580, between Doolan Canyon Road and Collier Canyon Road, in an unincorporated area northwest of the City of Livermore (see attached "Livermore Municipal Airport and Project Site" map). The southern edge of the project site is about 2,500' due north of the Livermore Airport runway. The site slopes upward from the elevation of the airport, 397', to about 750' above sea level.

The Broadmoor Development Corporation has requested rezoning of the subject property from Agricultural to a PD (Planned Development) District. The proposal calls for development of 260 acres to include 1,750 residences and auxiliary local commercial and public facilities including an elementary school. The highest residential unit would be constructed at the 532' elevation. The property at higher elevations would remain in open space or used for sewage disposal (see attached "Land Use and Development" plan).

Airport Land Use Considerations in the Draft EIR:

The Draft EIR concludes that there is "potential conflict of project with operations of Livermore Municipal Airport in terms of noise and safety" (DEIR, p. ii). Referring to a map of airport flight patterns (attached; this is Map XVIII, p. 47 of the ALUC policy plan), DEIR notes that one basic flight approach is directly over the site and that a portion of the landing pattern affects the southerly portion of the site. Planes enter the area from the northeast at an altitude of 1,400' - 2,000'; descending to about 1,000' over the subject property (DEIR, p. 78). The DEIR states that the proposed project is located entirely outside the official noise impact area of Livermore Airport (see "Noise Impact Zone," ALUC Policy Plan Map XVIII, attached). However, the DEIR also states the following:

... the site would experience noise impacts from aircraft. Single flyover events are not significant taken one at a time, but the steady daytime drone of planes approaching the airport on a major flight path is likely to generate complaints from future residents of the project. Airport operations average close to 600 per day. Pressure to curtail or modify operations could result. (DEIR, p. 79.)

The DEIR concludes that mitigations of the aircraft noise impact "is of questionable feasibility. Increased noise insulation of housing units may not be justified because no official noise standards would be exceeded; nor would such insulation mitigate effects upon the outdoor environment. A noise easement could

be required of the developer and the development through provisions of the PD District, which would not abate the noise, but might lessen the potential adverse impacts on the airport from future residents of the project" (DEIR, p. 80).

According to the DEIR, the proposed project would result in congestion at the interchange of Airway Boulevard with I-580. This interchange is the primary access to the Livermore Airport from I-580. The DEIR suggests a series of roadway improvements, including a new Collier Canyon Road that would run directly through the proposed project to tie-in with Airway Boulevard ("Traffic Diagram 7" attached) and reconstruction of the I-580/Airway Boulevard interchange to include new on-and off-ramps and widening of the overpasses from three to five lanes (see "Proposed I-580 Interchange" attached).

Comments On Proposed Project By Other Persons/Agencies

The Alameda County Planning Department has provided ALUC staff with copies of written comments received so far from other persons and agencies concerned with airport land use issues at the Livermore Airport. Copies of these comments are attached. Also included are letters received directly by the ALUC staff.

(1) Federal Aviation Administration (Letter, July 24, 1980)

The FAA has issued a Determination of No Hazard pertaining to the proposal's effect on aeronautical operations. However, the FAA added that the project would be within an area where aircraft noise could be a problem and stated that "adequate building plans could be developed to reduce the effect of the noise and prevent any future complaints" against the airport. The FAA did not recommend any specific noise abatement technique.

(2) Robert L. Kingsley (private pilot) (Letter, January 30, 1981)

Mr. Kingsley expressed concern that the project might exceed the building height allowed under the "Horizontal zone" defined in the Livermore Airport Master Plan and that construction of residences under an aircraft flight pattern altitude of 1,000' would not conform to airport safety or "homeowner serenity."

(3) Livermore Airport Commission (Letter, February 10, 1981)

The Livermore Airport Commission expressed concern with the proposed project, asked that the ALUC review all aspects of the development and its compatibility with the ALUC policy plan and requested that the Airport Commission be kept informed of all ALUC deliberations on the matter.

(4) State Department of Transportation (DOT), Division of Aeronautics (Letter, April 14, 1981)

The State DOT recommends against the project, although DOT has no discretionary approval authority over the project. The State DOT recommends that a noise study should be conducted; that a noise and aviation easement should be required of the developer as a condition of project approval; that acoustic treatment should be required of any residence in the project area; that a thorough traffic study be performed (this is a part of the DEIR); and that the FAA be contacted concerning possible hazards and penetration of the airport transitional surface (this has been done).* The DOT letter notes that Livermore Airport has recently been designated as an FAA Satellite Airport.** This designation, along with existing plans for airport expansion, will increase aircraft operations.

*See (1) above.

** The ALUC has requested an explanation of the meaning and importance of this airport designation.

(5) Robert L. Kingsley (private pilot) (Letter, December 7, 1981)

Mr. Kingsley, writing in response to the DEIR, noted that he felt the "Airport Flight Pattern" map used in the DEIR and in the Livermore Airport Master Plan (attached) is inaccurate. Mr. Kingsley notes that aircraft arrive at the airport over the proposed project site from the northwest, a pattern not shown on the flight pattern map. Mr. Kingsley also states that aircraft fly at an altitude of less than 1,000' and that the flight pattern that encircles the airport is actually wider than shown and encompasses a larger portion of the proposed project site (the flight pattern reported by Mr. Kingsley is shown in yellow on the attached map). According to the FAA, airport flight patterns are determined by the local airport manager in conjunction with the FAA tower chief. Mr. Kingsley's letter was referred by ALUC staff to the Airport Superintendent at Livermore Municipal Airport. The Airport Superintendent and FAA Tower Chief both state that Mr. Kingsley is correct in his analysis of the Livermore flight pattern (letter, January 4, 1982, attached). However, in a telephone communication, the Airport Superintendent stated that flight altitudes of under 1,000' over the subject property would be unusual, and would not be permitted if the flight is under FAA tower control.

Airport Land Use Considerations of the ALUC:

The proposed project lies within the ALUC's Livermore Municipal Airport General Referral Area (ALUC Policy Plan, Map XVII). In addition to EIR review, the proposed project must be referred to the ALUC for a determination of compatibility of the proposal with adopted ALUC policies and plans. The Final EIR should include a description of ALUC responsibilities and policies in the EIR's "Public Plans and Policies" section (pp. 81-88).

The proposed project site is located outside the noise impact and safety zones adopted in the ALUC Policy Plan (Map XVIII, attached). It is within the "horizontal zone" of the Height Restriction Map (Map XVI, attached), which allows a maximum height of 150' above the elevation of the Airport runway, or a maximum of about 547' above sea level. As indicated, no construction is proposed above an elevation of 532'. Basic flight patterns for the Livermore Airport are directly over the site, although the exact patterns have been questioned. The FAA control tower has control over all flights within five miles of the airport. However, hours of operation at the tower have been reduced from 7 a.m. - 10 p.m. to 8 a.m. - 6 p.m.* Planes continue to use the airport when the tower is not operating.

Although the proposed project lies outside the forecast 1995 airport noise contours, concerns over a possible noise impact expressed by several agencies/persons and by the DEIR itself suggest that a noise survey should be conducted to confirm existing noise contours and contours based on forecast increases in aircraft operations. The possible need for special acoustic treatment of residences and other sensitive uses could then be determined.

Although the DEIR states that there is a potential conflict between the proposed project and the airport in terms of safety (DEIR, p. ii), this statement is not explained or substantiated within the DEIR.

Conclusions:

In addition to EIR review, the proposed Northbluff development must be referred to the ALUC for a finding of compatibility with ALUC policies. The Draft EIR should be revised to identify ALUC responsibilities and policies. In addition, it is recommended that the Final EIR include a study of existing and projected aircraft noise on the subject property. The issue of safety, hazards either to aircraft operations or future project residents, should be detailed. This should include consideration of the actual approach and flight patterns and flight altitudes used by pilots at Livermore Airport.

*This is a result of the nationwide Air Traffic Controllers' labor dispute.



BAY AREA AIR QUALITY MANAGEMENT DISTRICT RECEIVED

1982 JAN 15 PM 10:40
January 15, 1982

ALAMEDA COUNTY PLANNING
DEPARTMENT

Alameda County Planning Department

399 Elmhurst Street
Hayward, CA 94544

Attention: Paul Deutsch
Planner III

Dear Mr. Deutsch:

We have reviewed the Draft Environmental Impact Report for Northbluff, a proposal to rezone a 393 acre site from agriculture to planned development, and to permit development of 1,750 dwelling units, commercial uses, an elementary school, a sewage treatment plant and disposal system, and a recreation center.

We appreciate that care has been given to air quality matters in the DEIR and that it is difficult to develop estimates of air quality impacts for alternatives which are not detailed or which may not seem to be of immediate feasibility. Nonetheless, we believe that best-guess estimates would be helpful information for the decision makers of Alameda County and, perhaps, for Livermore also. It would clarify, for them, differences in air quality impacts which would result from different development options. Cumulative impact analysis would demonstrate the air quality implications of similar decisions in nearby areas.

Total vehicle miles traveled, average daily trips and, consequently, air quality impacts should be substantially different if the planned housing can serve only long-distance commuters or if, alternatively, the housing will serve current or projected workers in the near vicinity. Taken alone, the journey-to-work may not be the major travel generator, but it is a significant fraction and the one most amenable to reduction through government action. We would suggest that plans for commercial and community services also be formulated, with thought given to minimization of traffic generation. (For additional information, please see our letter of October 5, 1981 on the Livermore-Amador Valley Air Quality/Housing Demand Analysis.)

The location of the sewage treatment plant in relation to housing should be discussed. The site plan shows townhouse development adjacent to the treatment plant site. Such proximity is undesirable because most treatment plants produce unpleasant odors. A discussion of wind direction and worst case odors or H₂S, in case of upset conditions, should be included. The District also has a permit role for sewage treatment plants. Information regarding permits can be obtained from the Director of Permit Services.

ALAMEDA COUNTY PLANNING DEPT.

PAGE 2

1/14/81

In Table 6 (page 29), a comparison is made between the number of days exceeding the .12 ppm standard and average high hour concentrations for ozone. The ozone standard was changed from .08 ppm to .12 ppm beginning with the 1978 reporting period, and the table should include this change.

On page 31, dust emissions from construction are discussed. We feel that the worst case concentrations should be estimated, and a comparison with standards made to determine if the particulate standard will be exceeded in the project area.

If we can be of assistance, please contact Sally Freedman, the Planner in our office.

Sincerely,



Milton Feldstein
Air Pollution Control Officer

MF/mc

cc: S. Wyman - CARB
M. Visconti - ABAG



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

RECEIVED

1981 OCT -9 PM October 5, 1981
55

ALAMEDA COUNTY PLANNING
DEPARTMENT

Mr. Paul Deutsch, Planner III
Alameda County Planning Dept.
399 Elmhurst Street
Hayward, CA 94544

Dear Mr. Deutsch:

We have received your letter of August 4, 1981 and the attached Livermore-Amador Valley Air Quality/Housing Demand Analysis. This letter is in response to your request for our review of the document.

On a conceptual level, an interesting analysis has been carried out regarding jobs/housing alternatives in relationship to air quality. If the assumptions and calculations are correct, there is indeed a very strong demonstration that local and close-proximity balances of housing to jobs would reduce total vehicular miles traveled (VMT) and, therefore, be a superior solution from an air quality point of view and be energy-conserving as well.

Of course, housing must be appropriate to those locally employed if a reduction in VMT is to be achieved. Adverse air quality impacts can be minimized if a large proportion of new employees are given the opportunity to find housing near their work places. On the other hand, two-way long distance commuting--with its adverse impact on air quality--will be increased if many who work in the Valley can only find appropriate housing quite far away, while the housing in the Valley chiefly serves those who commute to San Francisco or other distant employment centers. We believe that the study would be much more meaningful from an air quality point of view if these relationships were discussed candidly.

The study would also be more comprehensive as an analysis of alternatives if there were exploration of other assumptions about employment growth. The one assumption given is that the study area's percent of Alameda County nonagricultural wage and salary employment will grow from 5.9% in 1980 to 8.4% in 1990. Would it not be valid also to include a more limited assumption of employment growth in the Valley, e.g., a constant percentage of that anticipated in the County as a whole? What would be the housing demand and the resultant VMT and the air quality impact of such an assumption?

If there are any questions, please call Irwin Mussen, the Senior Planner in our office.

Sincerely,

Milton Feldstein

Milton Feldstein
Air Pollution Control Officer

MF:ay

cc: T. Smith - Phillips, Brandt, Reddick
M. Visconti - ABAG

DIRECTORS

JOSEPH G. DAMAS, JR.
President
FRANK BORGHI, JR.
HARRY D. BRUMBAUGH
CLARK W. REDEKER
CARL H. STRANDBERG



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STANLEY R. SAYLOR
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Chief Engineer

ROY E. COVERDALE
Assistant General Manager
& Auditor

KARL T-K NGAN
Assistant Chief Engineer

RUDY R. EVANS
District Supervisor

RECEIVED
L 12 JAN 15 AM 10:47
ALAMEDA COUNTY PLANNING
DEPARTMENT

January 14, 1982

Alameda County Planning Commission
399 Elmhurst
Hayward, CA 94544

Attention: Paul Deutsch, Planning Department

COMMENTS ON PROPOSED NORTHBLUFF REZONING AND DRAFT ENVIRONMENTAL IMPACT REPORT, SCH NO. 81021006

Ladies and Gentlemen:

The Board of Directors of Alameda County Water District urges you to deny or defer consideration of the rezoning application. The Draft Environmental Impact Report (DEIR) for this action is seriously inadequate in assessing adverse impacts and determining mitigating measures.

The DEIR does not adequately address precedent-setting approval leading to a proliferation of small discrete sewage treatment and disposal systems in the watershed. Other similar developments will be entitled to use similar systems if this proposal is approved. The cumulative potential for such development is obviously great when one views the potentially developable land within the Livermore-Amador Valley. There is no determination of the cumulative impacts which would result or mitigating measures to cope with the consequences of such proliferation.

The proposed sewage treatment and disposal system is very complicated. This is a sophisticated treatment system that includes direct filtration and reverse osmosis which require personnel with a high order of technical competency to properly operate and maintain. The same is true of the management of the spray disposal operation, but in vastly different skill areas. Experience with conventional small sewage treatment systems is that they often are not properly operated or maintained and are thus unreliable. The DEIR doesn't assess this problem or propose mitigating measures within the context of the applicant's proposal.

The dependability of a County Service Area (CSA) or Community Service District (CSD) in providing a proper level of service for these sophisticated systems is not evaluated either. The DEIR Erratum identifies the financial problems for the County that could result from system failures under either CSA or CSD management as various parties try to sort out the responsibility. A potentially lengthy delay in making expensive repairs is implied. What happens to the waste water from a malfunctioning system during this period?

January 14, 1982 - Page 2
Alameda County Planning Commission

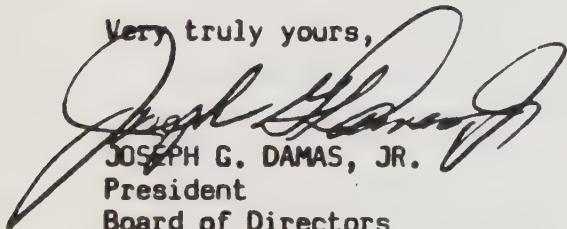
Would a small CSA or CSD be able to afford adequately trained and experienced personnel to operate the system 25 years from now? Moreover, what would be the cumulative institutional impact resulting from creation of a number of such agencies? None of these questions are addressed adequately as required by CEQA.

Finally, the District is opposed to any movement toward development of the unsewered areas outside the Livermore-Amador Valley Waste Water Management Agency service area before completion of the Zone 7 Waste Water Management Study. Until then, water quality impacts of discrete sewerage systems cannot be evaluated in comparison with other alternatives the study may find to be just as feasible or better.

There is no persuasive argument or compelling reason to leapfrog consideration of this matter ahead of the Zone 7 plan. Therefore, a rezoning decision is premature and should be deferred until after the Zone 7 study is completed and approved.

A technical supplement to our comments on the DEIR is attached. Please contact Stan Saylor, General Manager & Chief Engineer, if you wish clarification.

Very truly yours,

A handwritten signature in black ink, appearing to read "Joseph G. Damas, Jr." followed by "President" and "Board of Directors".

Attachment

cc: Attorney Gene Rhodes

ALAMEDA COUNTY WATER DISTRICT

TECHNICAL COMMENTS SUPPLEMENT
DEIR NORTHBLUFF, SCH NUMBER 81021006

SOILS, Page 17

Comment: The report does not discuss the effects of use nor mitigation for irrigation of soils with serious erosion potential. Soils classes La D and La E2 are defined on page 17 as having severe erosion hazards. Figures 15 and 28 indicate most of the proposed spray disposal area is on lands in the La D and La E2 classification.

SEWAGE DISPOSAL, Starting Page 62

Comment: The DEIR on page 18 states "Land application of treated effluent also poses unknown water quality risks. The Sewage Disposal Section of the report discusses these potential problems in greater detail."

However, the "water quality risks" are not discussed in the Sewage Disposal Section. The discussion of Impacts and Mitigation starting on page 63 refers to the problem only in general terms. The report on page 65 says the Zone 7 study will consider effluent land application impacts. If this is an incorporation by reference, it isn't valid until the Zone 7 study is finished and the DEIR is incomplete in the interim. In any case, mitigation measures as a part of the applicant's project are not covered nor referred to.

Comment: On page 65, a discussion of design treatment plant effluent concludes with a statement implying that project approval before adoption of the Zone 7 Waste Water Management Plan is justified, because of the quality of the effluent. If so, this should be followed with a discussion of the precedential impacts and mitigation thereof. Moreover, the November 24, 1981 Addendum to Draft Interim Report for Public Comment of the Zone 7 study has findings indicating coordinated waste water planning efforts and a pipeline over Boehmer Summit for export of sewage effluent as being more cost effective than several discrete systems of this type. The relative financial impacts of the proposed system are not discussed.

Comment: The proposed effluent disposal system envisions a complex spray irrigation system that would attempt to hold all of the wastewater and salts derived from wastewater on site, page 66. Discussion of salt buildup in the soils is limited to nitrates; accumulation of other salts is not discussed. If the wastewater and salts do not percolate as implied on page 9 in the discussion under Soils, Groundwater Conditions, and since the wastewater and salts cannot be allowed to run off as stated on page 66, then the salts will be concentrated in the surface zone of the spray application area. This will eventually render the spray area sterile for plant growth as a result of salt buildup. The DEIR does not discuss the salt buildup problem, a means of preventing it, nor an analysis of the eventual fate of the salts if the problem is somehow solved. Mitigation of the loss of plant cover on the disposal area should be determined in case the problem can't be solved.

Comment: On page 67, the DEIR states of the sewage treatment system: "If every component works as planned, water quality impacts would be insignificant." This statement is not supported by analysis or long-term example, and should be deleted unless it is.

Comment: The DEIR on page 68 under Mitigation states: "Consideration should be given to awaiting Zone 7's Waste Water Management Study results before commitment to any specific management arrangement so that alternatives to be explored by the Study are not curtailed by precedential action on this particular application." ACWD believes the County is required by CEQA to wait for completion of the Zone 7 study or to otherwise analyze the cumulative impacts on water quality of the potential future developments that could use wastewater systems similar to the one proposed for this project. Even this assumes the Zone 7 study will sufficiently determine the results of a proliferation of similar discrete sewage systems; if it does not, an additional study would be required. The precedential nature of the project is also discussed in Unavoidable Adverse Impacts on page 110 and under Growth Inducing Impacts on pages 112 and 113. Nevertheless, there is no assessment of resulting cumulative impacts as required by California Administrative Code Section 15023.5(b).

Comment: Under Mitigation on page 69, the DEIR implies the availability of the Livermore wastewater plant for emergency use. The City of Livermore at the December 21, 1981 Public Hearing contradicted this saying its plant has no available capacity for such consideration. The sentence should be modified accordingly.

ALTERNATIVE TO THE PROJECT, Page 110

Comment: One additional alternative is available and should be evaluated. This would be project deferral until the Zone 7 Waste Water Management Study Plan for the Valley is completed. The project would undoubtedly be able to proceed much earlier than the 1995 date given for the No Project alternative. In the meantime, the County would have a short period to properly plan for other services which may be problematic.



CITY OF PLEASANTON

AREA CODE 415 846-3202 :: 200 BERNAL AVENUE

P.O. BOX 520 :: PLEASANTON, CALIFORNIA 94566-0802

January 22, 1982

Mr. Paul Deutsch, Planner III
Alameda County Planning Department
399 Elmhurst Street
Hayward, California 94544

Re: Draft Environmental Impact Report
Northbluff/Broadmoor Development Company
1389th Zoning Unit
Collier Canyon Road/Interstate 580
SCH #81021006

Dear Mr. Deutsch:

The Planning Division has reviewed the environmental document for the project indicated above and offer the following comments for your review and response.

SEWAGE DISPOSAL

Ground water quality is a concern for the entire valley as development projects are proposed for the open areas of the County. The EIR states that the application of consultant recommendations relating to control of erosion and effluent runoff from spray irrigation cannot be made because the disposal sites are not known (page 12). Because of the potential effects on water quality, disposal sites should be included for some analysis within the scope of this environmental document. Development should, perhaps, await an overall ground water quality study for the entire valley (page 68).

While maintenance, energy consumption, construction and operational elements of the discrete system have been discussed, the fact that treated effluent must be pumped to the 700 foot elevation (page 65) does create a great potential for operational problems, particularly pump failure, either mechanical or energy related. This potential should be discussed further and specific mitigation measures listed. For instance, given the unpredictability of such a failure, what flexibility is there to effect repairs?

If there is a failure of the discrete system which would require installation of a public sewer system, what would be the magnitude of the costs to convert? Because of the size of the project, the evaluation of sewer facilities should be discussed, perhaps as a comparison between current Board policies regarding use of discrete systems and the establishment of County Service Areas and the projected overall development in this area of the County. Consideration should be given to a study for the development of an overall plan for the expansion of the sewer pipeline to serve the actual and potential wastewater requirements generated by this project.

RECEIVED

1982 JAN 25 PM 12:43

ALAMEDA COUNTY PLANNING
DEPARTMENT

Mr. Deutsch
1/22/82
Page 2

The text indicates that the treatment plant will be constructed in the "southwestern" corner of the site (page 63). We assume the site plan illustration of a southeast location is correct.

TRANSPORTATION/CIRCULATION

The tables listed in this section do not coordinate with the text. Corrections should be made to avoid confusion.

This section contains an analysis of projected traffic levels in 2005 based on the assumption that the Las Positas community and other adjacent areas were to be developed. Although the intent of this assumption is understood, the "worst case" (page 43) situation may not be just limited to that scenario. In the case of the Northbluff project, the access capability, a critical factor in evaluating any development of this nature and size, is limited and must be analyzed independent of other projects which are being reviewed under separate application and scheduling. We do not say that the existing analysis is invalid. However, given phasing of projects and the potential for a variety of decisions regarding development in this area, we suggest that the EIR would be inadequate if further discussion of the relative "isolation" of the project site were not included.

The Collier Canyon Road/Interstate 580 interchange would appear to be the only major access to the site. In the event of road construction or emergency, this access may be limited or completely eliminated. Collier Canyon Road would be a limited, lengthy access from the north. A comparison to the Springtown area of Livermore shows at least three separate major routes which may be used for that area. Further analysis should include development under such conditions, schemes for additional circulation routes, and coordination of development phases (Northbluff) with road improvements.

Regardless of the status of BART, Livermore's RIDEO bus system, or future public and private efforts to secure transit services (page 53), the EIR does not discuss the impacts of the lack of a site for a transit-related facility in the proposed land use plan. Concerns relating to air quality, energy consumption, and single occupancy vehicle usage all highlight such a need because of the location of the project site to potential employment and commercial centers. The proximity to a freeway interchange should be emphasized. The site plan shows the transit stop with surrounding areas committed to a park and residential units. The EIR should recognize the impacts of the precedent-setting nature of such development as it relates to transportation-related mitigation measures.

VISUAL AND AESTHETIC QUALITIES

We cannot agree that past development north of Interstate 580 in the Livermore area tends to reduce the significance of interruption of open space (page 76). It is unclear, for instance, how the elevations and viewsheds of Springtown or the Chabot College campus would compare to the Northbluff development. The entire Springtown development is certainly not visible from Interstate 580 because of intervening slopes and the northward direction of its development away from the freeway.

Because of the scenic qualities of the surrounding hills and mountain views to the entire valley and all who pass through, the scope of this section should be expanded to include an analysis of viewshed impacts from adjacent properties and the valley floor. Areas where residential units, noise barriers, and grading (1,151,000 cubic yards of earth are to be moved, page 77) would occur should be graphically presented to better illustrate the physical effects of development and the mitigation measures proposed. The local appreciation in the value of the surrounding hills in defining local community flavor would appear to require the further analysis of aesthetic and viewshed impacts to the Valley area. Due to the size of this project it would also appear to be an appropriate task at this time in the scope of the EIR rather than during the design review stage (page 77).

RECREATION/PARK SITE

The park site is located adjacent to the freeway interchange and "entrance" to the project site where park users would be subjected to noise and vehicle exhausts. The impacts affecting this park function have not been adequately addressed in the EIR. The site should, perhaps, be more centralized to provide greater accessibility for more residents of the area. Although such a site relocation would have a tendency to reduce dependence on the automobile, an initial examination of the park design does not appear to provide for off-street parking. Alternative sites should be discussed. An option which might be examined is locating the park adjacent to the proposed school site.

ALTERNATIVES

Other comments relate to the overall concept of the project in terms of land use. In light of the existing local demand for a diversity in housing choices, it is not clear what role this project will play in providing those choices. The proposed physical and financial efforts to accommodate this development are extensive and it would seem that provisions for housing could have a more obvious impact on this serious problem.

Mr. Deutsch
1/22/82
Page 4

Due to current economic trends, limited resources, and costs of providing services, serious consideration must be given to the alternative of locating the proposed residential capacity in the more urban areas of the County (pages 110-111). As the text of the EIR indicates, there are apparently serious questions of policy and precedence which must be answered. This would require additional time for analysis and for the public to express their views thereon because of long-term impacts to the quality of life in the valley. Because of the need for this project to have new "service" functions provided outside of established entities, development in this scenario would appear to be more the "cause" than "solution" to orderly growth in this area of the County. The commitment of open space/agricultural lands and the use of an on-site sewage treatment system should require additional information both for this and other projects in the area. In addition to the potential impacts on the infrastructure of the City of Livermore's services, there are implications for the residential and employment characteristics of the entire valley.

In summary, we feel that the County should not proceed with this project until additional studies have been completed. The precedent-setting nature of the project affects short and long-term commitments of resources, from both the public and private sector. Because of the site proximity to the City of Livermore, there should be more direct discussions of the potential connection of utilities and services to the City at some time in the future. The need for housing is great but the County and the valley residents should be able to more adequately assess the impacts, risks, and costs prior to any decision being made on the project.

We appreciate this opportunity to comment on the environmental document. If you have any questions, please do not hesitate to contact this office.

Sincerely,



Robert J. Harris
Director of Planning and
Community Development

RJH/gt

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

MEMORANDUM

DATE : January 28, 1982

TO : Alameda County Planning Department, Attn: Paul Deutsch

FROM : Ted Gerow, Public Health Engineer

SUBJECT: Draft E.I.R. - Northbluff Development

Please accept our apologies for the delay in our response to this Draft E.I.R. The document has been reviewed and we offer the following comments:

1. Solid Waste - Area presently served by Oakland Scavenger Company and extension of this service for Northbluff will be acceptable to this Agency.
2. Water Supply - This project, because of its size and density of housing units, must, in our opinion, be served by a community public water supply. Extension of existing systems to serve this development is our preferred choice. However, ownership and operation via County Service Area is also acceptable.
3. Sewage Disposal - We are in agreement with the E.I.R. that a community collecting sewer system be utilized and individual subsurface sewage disposal systems be prohibited. The disposal of the collected sewage presents some complex solutions that depend upon actions of others not under the control or jurisdiction of County agencies. We strongly favor and support export of sewage westerly through LAWMA facilities.

We believe that the waste management study nearing completion by C.D.M. consultants to Zone 7 will make surface disposal or percolation into groundwater most difficult and perhaps costly. It is our belief that operation of Reverse Osmosis systems for sewage, with our present understanding of the advancement of this system, is at present impractical and could result in abandonment of this method reverting back to export.

We do support the concept of ownership and operation of both collection and disposal must be through a public entity having authority to accomplish adequate sewage disposal service for the subsequent occupants of this development

TG:CB

cc: John Hughes, Sup. San., EHS, South County (w/encl.)

Office of the County Administrator

•Memorandum•

ALAMEDA COUNTY PLANNING
DEPARTMENT

RECEIVED

1982 FEB -4 AM 8:36

February 1, 1982



TO: William Fraley, Director, Planning Department
FROM: Mel Hing, County Administrator *Reel Slap*
SUBJECT: Northbluff -- Draft Environmental Impact Report (EIR)

The County Administrator's Office has completed its preliminary review of the draft Environmental Impact Report of the proposed Northbluff development project. There are a number of concerns, which, at this time, require further clarification in order for this office to assess its position relative to the future of the Northbluff project.

In general, there is a primary concern with the degree and scope of services that would have to be extended to make Northbluff a viable community. Additionally, there is concern regarding the present uncertainties in the housing market, and the potential consequences this may pose in the build-out phasing. These two variables together with the present development plans leave open the possibility for extensive short and long term County liability. Even taken separately, the proposed plan leaves unanswered the general question as to whether ongoing costs could be met through expected revenues.

In order to more completely assess the potential costs and benefits of the Northbluff project, further analysis from the developer is requested regarding the following:

SERVICES

Police. Present plan gives an inadequate costing of service. A more realistic schedule for phasing of the police protection, as well as alternatives and contingencies to proposed service delivery.

Fire. Existing phasing schedule does not adequately meet needs during build-out. More detail requested on full costing of capital expenditures, and a reassessment of staffing levels.

Sewage Treatment. Present fee system does not adequately address costs through build-out. More complete analysis of sewage system, including contingencies to future operations.

FUNDING/LIABILITY

Funding of ongoing costs are inadequately assessed. Developer relies excessively on CSA concept; further analysis is requested to consider alternative funding sources or organization concepts such as a CSD to reduce short and long liability.

William Fraley

-2-

February 1, 1982

REVENUE/COST

More detailed analysis of revenue and revenue time schedule. Full costing of proposed government services.

It is important for the County to evaluate and explore the complete list of options available to the Northbluff project, not only with respect to the Countywide picture but also concerning the future benefits to prospective Northbluff residents.

MH/TG:pm
4355B



State of California

GOVERNOR'S OFFICE

OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814

RECEIVED

1982 FEB 22 AM 10:43

ALAMEDA February 18, 1982

EDMUND G. BROWN JR.
GOVERNOR

Paul Deutsch
Alameda County Planning Department
399 Elmhurst Street
Hayward, CA 94544

SUBJECT: SCH# 81021006 1389th Zoning Unit, Northbluff

Dear Mr. Deutsch:

State agencies have commented on your draft environmental impact report (see attached). If you would like to discuss their concerns and recommendations, please contact the staff from the appropriate agencies.

When preparing the final EIR, you must include all comments and responses (CEQA Guidelines, Section 15146). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the agencies' comments by writing to them, including the State Clearinghouse number on all correspondence.

A recent Appellate Court decision in Cleary v. County of Stanislaus clarified requirements for responding to review comments. Specifically, the court indicated that comments must be addressed in detail, giving reasons why the specific comments and suggestions were not accepted and factors of overriding importance warranting an override of the suggestion. Responses to comments must not be conclusory statements but must be supported by empirical or experimental data, scientific authority or explanatory information of any kind. The court further said that the responses must be a good faith, reasoned analysis.

Section 15002(f) of the CEQA Guidelines requires that a governmental agency take certain actions if an EIR shows substantial adverse environmental impacts could result from a project. These actions include changing the project, imposing conditions on the project, adopting plans or ordinances to avoid the problem, selecting an alternative to the project, or disapproving the project. In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect (Section 15088) and it must support its actions with a written statement of overriding considerations for each unmitigated significant effect (Section 15089).

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources, as well as with the County Clerk.

Please contact Anna Polvos at (916) 445-0613 if you have any questions.

Sincerely,

Stephen Williamson
State Clearinghouse

Stephen Williamson

Memorandum

To : Steve Williamson
State Clearinghouse
1400 - 10th Street
Room 121

Date : FEB 3 1982

Subject: SCH #81021006

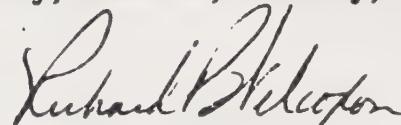
From : Environmental Health Division
714 P Street, Room 430

The Northbluff draft EIR has been reviewed by the Sanitary Engineering Branch. There are no objections to the proposed project in regard to water and sewage disposal.

However, one area of potential concern lies with the generation of aerosols from spray disposal of treated wastewater. The wind direction analysis (Fig. 19) indicated that the project would be subject, approximately 25% of the time, to northerly winds. These winds could lead to aerosol drift from the spray area, across the 300 foot buffer zone, and onto residential property and public areas. The final EIR should include a wind rose that incorporates velocities.

This Department has technical requirements that would be pertinent to the design and construction of the proposed sewage and disposal systems. This office should be contacted prior to the preparation of plans and specifications.

We appreciate having the opportunity to comment on this report. If there are any questions regarding the aforementioned feel free to contact Chuck Steinbergs, Sanitary Engineering Branch, 2151 Berkeley Way, Room 234, Berkeley, CA 94704-9980, (415) 540-2152.



Harvey F. Collins, Ph.D.
Deputy Director

cc: Dorothy Wilson, DWR
Alameda County Health Department

Memorandum

To : Ann Barkley, Chief
Division of Transportation Planning
Attention F. D. Husum

Date: January 6, 1982

File : 04-Ala-580 PM 15.0+
SCH #81021006

From : DEPARTMENT OF TRANSPORTATION-District 04
Environmental Planning

Subject: Caltrans District 04's comments on the Draft Environmental Impact Report (DEIR) for Northbluff Development, Livermore. County of Alameda is the Lead Agency.

1. Caltrans has neither plans nor funds budgeted for future improvements to Interstate Route 580, in the Livermore area, to handle additional traffic.
2. Traffic Diagrams #5 and 6: The proposed additional lanes and new loop look feasible. The only drawback is the unsymmetrical interchange. However, for the small traffic volumes (30 AM and 210 PM), a new eastbound diagonal on-ramp to make it symmetrical probably could not be justified.
3. Traffic Diagrams #10 and 11: There are not enough lanes to handle the PM peak-hour volumes. The eastbound off-ramp should have a triple left turn instead of a double left. The northbound Airway Boulevard approach to the off-ramp and Airway Boulevard intersections should have three through lanes instead of two shown.
4. Southbound Airway Boulevard through the interchange needs only one lane, not two as shown on Traffic Diagram #10.
5. DEIR, page 53: Project Developer should provide specific area for Car-pooling and Ride Sharing staging area within the Projected Local Commercial Area Parking Lot.
6. Sections III-D-2-b and c (1986 Traffic Impacts, and Mitigation), and III-D-2-d and e (Future Traffic Impacts - Year 2005, and Conclusions of Analysis) address these subjects in much detail and their assessment of impacts appear to be reasonable.
7. The envisioned 1986 mitigations would include major realignments and additions to the I-580 and Airway Boulevard Interchange, while their year 2005 traffic projections (which would include traffic generated by the proposed new town of Los Positas, population 40,000 to 45,000) would necessitate additional ramps, structure widening and a complete new full interchange on I-580.

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8. The DEIR does not clearly describe the funding arrangements for the proposed additions to the State highway system. We will not finance any project-related mitigation measures. Any work within the State highway right of way needs to be adequately described; the work must be evaluated for possible significant environmental consequences, and such work will be subject to our encroachment permit process.
9. DEIR, page 5: It is not clear whether the "urban infrastructure" is intended by the proponents to include parts of the (Inter-) State Highway System. It is therefore suggested that the EIR specifically address the funding mechanisms for these improvements.
10. A detailed review of the traffic projections is not warranted at this time. Such a study--including possibly an operational analysis--should be made if and when contemplated interchange improvements enter our planning stage.
11. DEIR, page 88: Recognizes that the project appears to fall outside the priorities of the "California Urban Strategy," that an encroachment permit and other State agency approvals may be required, and that the project runs counter to "California Urban Strategy" policies. Please note that we are bound to consider the "Urban Strategy" when evaluating requests for transportation improvements, and will have serious concerns regarding the issuance of encroachment permits.

Mr. Paul H. Hughes is the contact person for our agency, and is available at the following address:

Paul H. Hughes
Acting District CEQA Coordinator
Caltrans District 04
P. O. Box 3366, Rincon Annex
San Francisco, CA 94119

Should you have any questions concerning these comments, please contact Ray Duggal of my staff at (415) 557-2830.

for Ray Duggal
PAUL H. HUGHES
Acting District CEQA Coordinator

cc:(i) State Clearinghouse

(ii) Paul Deutsch, Planner III
Development Planning Division
Alameda County Planning Department
399 Elmhurst Street
Hayward, California 94544

6. REDGWICK CONSTRUCTION COMPANY (cont'd)

Mr. Sorensen read a letter from Mr. Plato requesting continuance of the application to a date sometime after the January 4th hearing.

Commissioner Bernhardt moved continuance to January 4, 1982. Seconded by Commissioner Tully and carried.

7. 1389TH ZONING UNIT - NORTHBLUFF BY BROADMOOR DEVELOPMENT COMPANY - To reclassify form the A (Agriculture) District to the PD (Planned Development) District, to permit development of 1,750 housing units, a 6-acre commercial area, an elementary school, a sewage disposal system, and a recreation center, on a 393 acre site located north of Interstate 580, between Doolan Canyon Road on the west and Collier Canyon Road on the east, northwest of Livermore, unincorporated Alameda County.

Mr. Deutsch presented the staff report. He recommended that the Commission take testimony on the Draft EIR and continue the public hearing to February 1, 1982, to permit preparation of the Final EIR and recommendation by staff.

Mr. Michael Farley representing Broadmoor Development advised that his firm has been working on this program for two years. He said that they would request that the Commission review and consider the EIR, listen to testimony, spend the next six weeks considering that information and on February 1, 1982, approve the development and certify the EIR. He said this would allow them to look at the details to decide the structure of the various elements of the project and solve problems. He related that it is difficult to justify spending money on studies at this point without an indication that residential development is appropriate as indicated under the General Plan.

He spoke in regard to the waste water treatment and indicated that they do not have the answers today, they hope to answer the issues that need to be addressed for the zoning at this time. He indicated that his firm is owned by Genstar Development and specialize in residential land development. He explained the relationship of Broadmoor homes with other sister companies and indicated that their intention is to improve the land, build the streets, provide schools, landscaping and surface improvements, and sell many of the neighborhood and residential locations to Broadmoor Homes and other major builders as well. He indicated that this would provide for variety and efficiency in development of 1750 homes.

He advised that they have the expertise to complete a project of this type as evidenced by the Crow Canyon Country Club Development in San Ramon, a project they developed.

He described the studies that his company undertook before they came to the conclusion as presented today. He said that the property is located adjacent to urban development, a Junior College Campus that is now in existence, it is next to a major freeway, across the freeway from a business industrial park that is under construction now, and the property is located near the Livermore Airport and it integrates in with the fabric of urban uses in the area.

Mr. Farley referred to a map and said that they felt that the project meets the master plan for the area.

He referred to the map titled "Circulation" and described the location of the subject property with regard to the interchange.

With respect to the Livermore Airport, he advised that they did contact FAA and the ALUC. He described the response of the FAA and noted that this would be no different than any of the other development which has occurred in this end of the City of Livermore. He indicated that with regard to the portion of the property which is within the 65 CNEL there are development methods which

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7. NORTHBLUFF BY BROADMOOR DEVELOPMENT COMPANY - (cont'd)

can mitigate noise and the noise impacts are not an unusual or unsolvable situation. He said that they do not have a proposal as part of this application at this time.

He spoke of the present use of the property as agriculture, and advised that this property is not in an agricultural preserve and it is not prime agriculture land. He advised that to help pay the taxes the owners have leased the land out for grazing. He indicated that the biggest constraint with regard to the land is that it is not in a system that could provide waste water treatment. He said that they engaged a consultant that has expertise in the design of waste water systems, Lowry and Associates. He said that at that point they did evaluate the highest and best use of the property and were prepared to act accordingly. He indicated that they evaluated public use, industrial park and then residential use. Looking at market needs and the General Plan, residential development stood out as the highest and best use of the property at this time.

He advised that they contracted with the Deane Organization to perform an indepth market research and out of the study came a report that recommended a design concept for that property now known as Northbluff. He said that the study recommended a single family market of a variety of housing types and neighborhoods. He indicated that they hired the firm of Purcell Rhodes and Associates to study the soils and underlying geology and they issued a report that there are no known earthquake faults nor land slides and the soils are of three types. He indicated that the map on display shows the conclusions of the study.

Mr. Farley then referred to a map titled "slope analysis". He referred to a study of the sewer service, water pressure and the lift station that will be required to move treated water to the hill top. He pointed to a map and spoke as to the solar orientation of the property as it relates to housing sites. He indicated that they understand that they will be responsible to see that a school gets built at a certain time, and they are also providing a small commercial site for convenience shopping for the residents of Northbluff.

He referred to the land use and development plan and said that in regard to the sewer treatment it is larger than is needed for the development. He indicated that they are building a park that would be dedicated to the Livermore Park and Recreation District and said that they understand that if this park is to be anything other than a vacant lot, they will have to provide the landscaping.

He pointed to the location of another private recreational facility which will be owned and operated by the resident of Northbluff. He described various recreational facilities which might be provided.

Mr. Farley then referred to a phasing map. He said that they would like to proceed to develop in response to the demands of the market place and if it takes six years then it will take six years and the phasing map is an indication of a logical sequence.

He indicated that in their dealings with Cal Trans it was determined that modification of the interchange was necessary to accommodate future traffic. He described the stop sign and lane changes that need to be accomplished on Collier Canyon Road. He assured the Commission that they don't intend to make life less convenient for anyone as a result of this development. He noted that at the time they had preliminary discussions with regard to Northbluff it was at the end of 1979. He said that they have accepted as a

7. NORTHBLUFF BY BROADMOOR DEVELOPMENT COMPANY - (cont'd)

given that this project cannot become a burden on the taxpayer that already lives here. He advised that they brought in a firm to give a fiscal analysis of the cost of providing urban services needed for this project. He advised that the study shows that Northbluff will deliver a surplus of in excess of \$600,000 every year when built out.

Mr. Farley indicated that this report was furnished to the County staff at the beginning of 1981 and it took a year to evaluate the material and prepare the EIR. He advised that the staff has taken the matter to the Board of Supervisors and the Board adopted a resolution to say it would consider a discrete system on projects like Northbluff.

He said that their studies would show that this development would provide jobs for six full years of continuous employment for 400 workers. He called this a positive proposal and said there is nothing negative about it. He indicated that he has tried to illustrate that this is not a leap-frog project.

Mr. Farley asked for positive consideration and asked for Commission leadership and help in providing approval for 1750 homes for families that are not here to ask for it.

Commissioner Bernhardt noted that ABAG has allocated 25,000 homes for Southern Alameda County. He asked if financing would be a consideration in delay of this project if the project is approved.

Mr. Farley advised that they would hold the project until it is economically appropriate to build the houses but now is the time to get approval so that they will be ready when the market is ready.

Commissioner Douglas asked if the children would have to go to Livermore schools until the school in the development is complete. Mr. Farley said that would be a matter for consideration between the developer and the Livermore School District. He said that they would meet the requirements of the School District.

Mr. Joseph Davis, Jr., President of the Alameda County Water District, said that their water district provides water for over 200,000 people and they are concerned that upstream quality not be degraded. He was concerned about the proposal for waste water treatment. He was concerned about assurances both now and in the future as to maintenance and operation. He advised that his Board of Directors directed the staff to prepare comments on the EIR.

Mr. Saylor, General Manager of the Alameda County Water District, was present. He said that they believe that the EIR is inadequate in assessing the following impacts:

- (1) Reliability of the proposed sewerage system; feasibility of CSA or CSD for a small area
- (2) The consequences of setting a precedent in the approval of this project which would lead to a proliferation of discrete sewerage treatment plans.
- (3) Obstruction of carrying out Zone 7's Wastewater Management Plan.

He said that they believe that the sewer system proposed is quite complicated and involved and there is no provision for major malfunction. Further the disposal system is very complex to manage and in their opinion although it is smaller the system is more complex than the San Jose Municipal Treatment Plant,

7. NORTHBLUFF BY BROADMOOR DEVELOPMENT COMPANY - (cont'd)

He then spoke of the possibility of insufficient funding to correct malfunctioning. He also indicated that if the county is to underwrite or not underwrite a major malfunction, the EIR should deal with that question. He spoke to the precedent setting effect of the approval of this proposal and noted that the EIR refers to cumulative impacts but does not detail the cumulative effects. He noted that the EIR does not mention the potential impact on the County of underwriting all such developments or what the environmental impacts would be. He also noted that the future of the Zone 7 Waste Water Improvement Plan is not assessed. He found it inconceivable to ignore the Zone 7 Study now when it is on the verge of completion. He urged the Commission to direct a redraft of the EIR and continue the hearing until the redraft is complete.

He suggested that the rezoning application be denied without prejudice and that you suspend all consideration until the Completion of the Zone 7 Waste Water Plan.

Mr. Gene Rhodes, Attorney for the Alameda County Water District, was concerned with protecting the water system to some 200,000 customers that the Water District services. He complimented Mr. Farley on his presentation and said that it is easy to forget whey we are here. He indicated that the point is whether or not the EIR is deficient or complete in its entirety, and addresses in sufficient detail all concerns that are apparent in opening new areas such as this one. He said that if you listen to the applicant you are sure that the developer has taken numerous precautions, and hired experts to answer questions.

Mr. Rhodes said that the EIR does not address in depth some of the most apparent problems. He referred to page 62 dealing with sewer and noted that the EIR does not address who will monitor the operation. He said that the developer has said that he does not want to go the rest of the way with studies until he has the approval of the project; that places the County in the position of approving the project without answers to the sewer and utility question which could cause a fight at a later date after the developer has more money in the project.

He said that if he were the developer he would want the Zone 7 report in and want to sit down with the Alameda County Water District and other agencies prior to approval, as those agencies could cause more delay in this project. He believed that the action of approving this matter is premature as this is an incomplete EIR, the details are not stated, it merely says that we will have to look further into other problems.

He indicated that the only problem his District is talking about is the problem of water quality, and he would contend that the way the sewage treatment is addressed makes this EIR inadequate and premature at this time.

He noted that homes are available and going begging for sale in the City of Fremont. He suggested that getting the EIR done right and taking sufficient time is the correct way to proceed for a company that is marketing those homes some three to six years from now.

Mr. Howard Nies, Planning Director with the City of Livermore, advised that a letter has been delivered indicating their opposition to the development. He indicated that other points are contained in the letter.

Mr. Steve Deven representing the Deven property which is 100 acres to the west of the subject property, spoke concering the access on the Doolan Road side of the interchange. He noted that there is no development on the west side of the interchange and wondered if the plan is to change the access to the left. He also spoke concerning the spraying of the effluent and asked if any consideration had been given to the adjacent property owners under the plan. He said that they graze lambs and cattle on the adjacent property. He also questioned the statement that the subject property

7. NORTHBLUFF BY BROADMOOR DEVELOPMENT COMPANY - (Cont'd)

is planned for residential as this is an agricultural area.

Mr. Deutsch advised that precise areas that would be sprayed are not shown and there are 300' buffer areas between the spray disposal areas and the developed areas on the site, and the same 300' minimum should extend between adjacent properties as well.

Ms. Pat Waters of Collier Canyon Road submitted a petition signed by the residents of Collier Canyon Road in opposition to the proposed change in zoning that would permit development of the proposed project. She indicated that she is a 30 year resident of the area and would point out that the soil is adobe and dries in the summer and swells in the winter. They as residents are concerned about the spray method of disposal of effluent because of possible contamination of the water table and their wells which are 200' in depth. She felt that this development would lower the quality of life in the Valley and spoke of the cost in services and energy that this development would cause. She felt this is a leapfrog project and recommended that the development wait until the area can handle the services required for such development. She indicated that the subject area is subject to flooding and felt that the airport noise is definitely a consideration. She was concerned about the watershed going down Niles Canyon as that creek is used for recreation. She said that the residents in the area would not favor abandoning Collier Canyon Road and they need easy access to the freeway and shopping in Livermore.

Mr. Gonzales, owner of two parcels on Collier Canyon Road questioned the proposal to utilize Collier Canyon Road for this development. He said that Collier Canyon Road was built for those people living on Collier Canyon Road several years ago by the Division of Highways. He was concerned about the sewer plant proposed which is only several hundred feet from his property. He asked that Collier Canyon Road be left as it is.

Mr. Arthur L. Waters of Collier Canyon Road, said that the plan shows the sewer plant close to his home and he objects to that very much. He noted that the prevailing winds come from the west and in the winter from the northwest.

Mr. Doug Denton of Collier Canyon Road, spoke in opposition to the development, and felt that the community service district proposed would be another layer of government which is not needed. He indicated that it might be necessary to bus children to Livermore for school until the developer gets an elementary school set up and he asked if the developer is willing to pay for that busing.

Ms. Martha Haapnen of Collier Canyon Road advised that Broadmoor Homes has not contacted any of the residents on Collier Canyon Road. She said that she objects very much to the proposal. She objected to the possible degradation of her water by the proposed development and also to cutting off of Collier Canyon Road and requested that the Planning Commission disapprove the proposal.

Commissioner Shockley asked if Health Care Services has replied to the EIR.

Mr. Deutsch replied that it was referred to them but a reply has not yet been received. He advised that questions received will be answered in the EIR. He explained the sequence of the preparation of the environmental impact report.

Commissioner Shockley was of the opinion that the response of other agencies was more complete than that of the Health Care Services.

Chairman Douglas was concerned with the housing mix proposed and noted that the alternative of low and moderate income housing is not addressed in the alternative section of the report. She felt that it should be addressed and expanded upon in some detail in the alternatives section.

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7. NORTHBLUFF BY BROADMOOR DEVELOPMENT COMPANY - (Cont'd)

She also noted that there was discussion by the applicant of the need for this project as evidenced by the market report; if there is a need for this housing, by the time this housing is built it will be more suitable for higher income residents, she requested more justification for the type of housing proposed. She also noted that on page 36 it is mentioned that housing is proposed to augment housing for new employment opportunities in the Valley, but it doesn't go into detail as to the type of employment planned for the industrial park section of North Bluff. She said that should be expanded upon. She was also of the opinion that the cumulative effects of the development of this proposal and Las Positas should be addressed. She noted that with regard to the schools and other services it doesn't go into an assessment of the cumulative effects.

Chairman Douglas felt that if it is known as to why that information is not included that should be stated. She also had questions about the fiscal analysis and noted that the report does not deal in depth with regard to the County's financial liability should the system fail, and if it were to be under construction and there are financial problems would the County be responsible for completing the construction of the project.

Chairman Douglas also asked why federal dollars are included in the fiscal analysis.

Commissioner Shockley was concerned about the transportation and circulation section and its relationship to the Las Positas proposal. She said she has difficulty in looking at this draft EIR separately from planning for other areas. She noted that today a hearing was set for Las Positas General Plan Amendment and that would bring up the important questions about a county service area. She suggested that the Commission hold a work session so they could look at this in a more comprehensive way.

Mr. Fraley pointed out that the Planning Commission is in the public hearing process and they should be sure that any discussion of this project be done as a hearing. If there are aspects of the project that haven't been studied well enough the staff should know those, so that they can look into them and have answers prepared.

Mr. Fraley pointed out that the Board of Supervisors found that they are not opposed to using the CSA and CSD, and as far as taking each project that may be in the Valley and lumping them all together the Board of Supervisors decided that they did not want them processed that way. He said that the Board instructed the staff to take the projects as they come in and process them. He advised that the County does not have a specific policy on how they will deal with the management of these waste treatment facilities and that cannot be resolved with respect to Las Positas. He advised that the Manager of Zone 7 will make a report concerning waste management dealing with an aspect of this concern.

Mr. Fraley asked the Commission to advise him if they have a particular format in which they would like the study approached.

Commissioner Douglas said that the reason for suggesting a work session is that it allows for more basic interchange between the Commission and staff and that takes some time. She felt that the work session would permit the Commission to more fully understand the proposal.

7. NORTHBLUFF BY BROADMOOR DEVELOPMETN COMPANY - (Cont'd)

Mr. Fraley recommended that the January 4, 1982 meeting be used for the purpose of taking any additional testimony on the EIR, cut off the public testimony, and then have the work session and continue the hearing to another time so that others may comment on whatever is submitted.

Commissioner Warren was concerned about the subject of discrete sewer systems.

Chairman Douglas requested that this property be placed on the January field trip.

Commissioner Shockley moved that the Commission schedule a field trip and after the field trip a work session to include the opportunity to raise some questions concerning the EIR. She suggested that the Commission could indicate to staff what the concerns might be prior to the meeting, and said that the public hearing would be at 6:00 p.m. on January 4, 1982 which would be a continuation of this hearing.

Seconded by Commissioner Warren and carried.

8. Review of Zone 7 Draft Interim Report, Waste Water Management Study for the Unsewered, Unincorporated Area of Alameda Creek Watershed Above Niles

Mr. Mun Mar, General Manager of Zone 7 advised that the Consultant retained by Zone 7 has prepared an interim report. He advised that the study is scheduled for completion with a final report scheduled in February, 1982. He reviewed the meetings held to review the progress of the study. Copies of the statement of Mr. Mar and attached maps are on file.

Commissioner Shockley requested a copy of the interim report.

Mr. Mar agreed to furnish copies of the report to the Commission.

There being no further business the meeting adjourned at 5:15 p.m.

WILLIAM H. FRALEY - PLANNING DIRECTOR AND SECRETARY
ALAMEDA COUNTY PLANNING COMMISSION

M I N U T E S

OF

THE COUNTY PLANNING COMMISSION OF ALAMEDA COUNTY

The January 4, 1982, meeting of the Alameda County Planning Commission was held at 1:30 p.m. in the Auditorium of the Public Works Building, 399 Elmhurst Street, Hayward, California.

The following Commissioners were present:

Commissioner Sid Sutherland
Commissioner Mary Warren
Commissioner Barbara Shockley
Commissioner Shirley Douglas

Commissioners excused:

Commissioner Bernhardt
Commissioner G. Spiliotopolous
Commissioner Griffith Tully

Others Present:

William H. Fraley, Planning Director

The meeting recessed to visit:

1. 1504TH ZONING UNIT - David & Lina McPeake - Petition to reclassify three parcels containing approximately 2.3 acres, located at 708 through 722 Marin Avenue, southside, from the R-S-D-3 (Suburban Residence, 2700 sq. ft. m.b.s.a.) District to the R-4 (Multiple Residence) District, Hayward Area, unincorporated Alameda County and bearing County Assessor's designation: Map 432, Block 44, Parcels 3-3, 30-5, and 30-6.
2. 1389TH ZONING UNIT - NORTHBLUFF BY BROADMOOR DEVELOPMENT COMPANY - To reclassify from the "A" (Agriculture) District to the "PD" (Planned Development) District, to permit development of 1,750 housing units, a 6-acre commercial area, an elementary school, a sewage disposal system, and a recreation center, on a 393 acre site located north of Interstate 580, between Doolan Canyon Road on the west and Collier Canyon Road on the east, northwest of Livermore, unincorporated Alameda County.

The meeting recovered at 3:35 p.m. for a work session and public hearing.

Others Present:

Georgia Rubiolo, Recording Secretary
Adolph Martinelli, Senior Planner

3. 1389TH ZONING UNIT - NORTHBLUFF BY BROADMOOR DEVELOPMENT COMPANY - To reclassify from the "A" (Agriculture) District to the "PD" (Planned Development) District, to permit development of 1,750 housing units, a 6-acre commercial area, an elementary school, a sewage disposal system, and a recreation center, on a 393 acre site located north of Interstate 580, between Doolan Canyon Road on the west and Collier Canyon Road on the east, northwest of Livermore, unincorporated Alameda County.

Chairman Douglas indicated that this portion of the session is to be a work session among commissioners and that the public hearing will be continued to 6:00 p.m.

Planning Commission MINUTES
January 4, 1982 Page 2

Mr. Fraley reviewed the items of concern as submitted by Commissioner Shockley and Chairman Douglas.

Commissioner Shockley advised that she had raised the question of the review of the Livermore Amador Plan as it relates to discrete sewerage plants as she is the only member of the Planning Commission that was a member at the time of that Plan Amendment.

Mr. Martinelli explained that a plan amendment is not involved in the current development application. The property is designated for residential uses subject to the determination that services can be provided. He indicated that in the draft EIR policies are listed. He said that the Board of Supervisors was aware of the policies in the plan when they designated the site for residential development, knowing it was in the unincorporated area; therefore, presumably it was determined to be consistent with plan policies.

Mr. Martinelli then reviewed the sequence of events leading to the action of LAFC on November of 1981 refusing to include Northbluff in the Livermore Sphere of Influence requested by the City of Livermore. He reviewed the dates and actions of LAFC as it relates to the CSA.

Commissioner Sutherland asked if the statement that there is to be no additional costs to the people, takes into consideration such things as the additional property and sales taxes that the new development will generate.

Mr. Fraley advised that is a statement that the Board of Supervisors adopted and the purpose of adopting the statement was to give an indication that whatever was to be developed in the way of service facilities would not become a burden to those that aren't in this development.

Commissioner Sutherland was interested in knowing exactly what no additional costs to the county would mean.

Chairman Douglas noted that a fiscal analysis is included in the EIR but the problem with such analysis is that they must be based on assumptions which may or may not occur.

Mr. Martinelli believed that the biggest assumption is that the project will be built out. He reviewed the major differences between a County Service Area (CSA) and a (CDS) Community Services District.

Chairman Douglas asked about county liability to be assumed if this project is built.

Mr. Fry pointed out that if there is a financial problem it would have to be resolved regardless of the governmental agency responsible.

Chairman Douglas was interested in finding ways to minimize potential liability to the county in terms of requiring bonds or payments.

Mr. Fraley advised that those things would be done when the agency is set up. He believed that the financial liability could be entirely negated but it is not possible to indemnify the Board from being requested to solve a future problem.

Commissioner Sutherland pointed out that the people living in the new development would also share the liability of solving problems which may arise in other areas of the County.

The Commission discussed the history of County involvement in solving service problems.

Planning Commission MINUTES
January 4, 1982 Page 3

Commissioner Shockley asked for an explanation of the relationship between Zone 7 and the Regional Water Quality Control Board.

Mr. Mun Mar, General Manager of Zone 7, explained that in terms of planning in the Valley, Zone 7 has been working with the Regional Board in terms of the study. He explained the status of the studies being conducted by both Zone 7 and the Regional Water Quality Control Board.

He advised that Zone 7 will be commenting on other proposals. He indicated that the final report of Zone 7 should be completed by the end of February and the final public hearing on the report before the end of this fiscal year.

The meeting recessed at 4:35 p.m.

The meeting reconvened at 6:00 p.m.

The following Commissioners were present: Commissioners Absent:

Commissioner Paul Bernhardt	Commissioner Griffith Tully
Commissioner George Spiliotopolous	
Commissioner Sid Sutherland	
Commissioner Mary Warren	
Commissioner Barbara Shockley	
Commissioner Shirley Douglas	

Others Present:

William H. Fraley, Planning Director
Bruce C. Fry, Asst. Planning Director
Adolph Martinelli, Senior Planner
Randy Dean, Planner II
James Sorensen, Planner III
Georgia Rubiolo, Recording Secretary

3. 1389TH ZONING UNIT - NORTHBLUFF BY BROADMOOR DEVELOPMENT COMPANY.

Mr. Fraley advised that this is the time to submit any comments on the draft EIR.

Mr. Carl West of 4015 Collier Canyon Road, indicated that he has submitted two letters, one to the Planning Department and one to Broadmoor Homes. He advised that he lives on adjacent property to Northbluff, the side where they propose to dump the treated sewerage. He was very interested in the outcome of the test that will be run. He felt that it is obvious that with the amount of runoff that is occurring during the rainy season, it could very well affect the groundwater.

In response to a question from Commissioner Douglas on Northbluff services which could be extended to serve adjoining areas, Mr. Martinelli referred to Page 90 of the EIR, Table 20, which discusses public services provided for Northbluff. He indicated that there is no development designated by the County General Plan for adjoining areas other than the area already in the City of Livermore. He discussed the elements of the infrastructure proposed to serve Northbluff which could be expanded to serve development of adjoining areas. He indicated that in the EIR, traffic was discussed in two modes. It is not intended that the traffic discussion complete all the environmental assessments required for adjoining development such as Los Positas, but it is intended that the discussion provide enough information to assure reasonable access to adjoining property and at the same time maintain a reasonable livability standard for the residents of Northbluff.

3. NORTHBLUFF (cont'd)

Commissioner Shockley asked if there is any requirement on the part of Regional Water Quality for Zone 7 or Regional Water Quality Control Board to look at Northbluff and beyond in planning for the waste water treatment.

Mr. Mar explained that the regional water board staff did review the proponents proposal relating to the discrete system and the demineralization process that they included was in response to an interim study that his Board reviewed several months ago. He believed that the regional staff review of the proposal is part of the record. He read a letter from the Regional Water Quality Control Board dated August 10, 1981.

Commissioner Spiliotopolous asked if the discrete sewage plant proposed for this project would be subject to the same rules and regulations as a municipal sewage treatment plant.

Mr. Martinelli believed that this proposal is of a higher standard than the existing municipal system. He indicated that the cost would be higher from an operational standpoint. He was unaware of the standards that the RWQB would apply although he indicated that the demineralization process was added to the proposed treatment plan in response to concerns of RWQCB staff, and the staff indicated that the revised plan would substantially mitigate water quality impacts. He further advised that there was a consistent problem in the EIR dealing with the numbering of pages and tables referenced in the report. He advised that a correction statement will be sent to everyone who received an EIR.

Commissioner Douglas asked how the housing units relate to the mix that has been identified in the housing element for the Livermore Amador Valley and if the Commission was to require a mix how would that requirement be implemented.

Mr. Martinelli advised that the housing element has a table on needs but there is no County policy on implementation of the mix and there is no program for inclusionary zoning. He spoke of a project in the Dublin area which has been approved and would satisfy a portion of the need for moderate income housing.

Mr. Fraley noted that there is nothing to preclude the Commission from covering the issue of low and moderate income housing and he thought that the proponents should respond to the issue. He thought that the method of implementing such a policy would be to include it in the zoning which would then be adopted by legislative action.

Mr. Martinelli advised that the staff will furnish the Commission with the figures that were developed for the housing element.

Commissioner Shockley indicated that she would be interested in including consideration of solar energy as a condition of approval.

Commissioner Spiliotopolous requested that the staff prepare a comparative table of the cost of services under the CSA as opposed to a municipal operation such as Pleasanton.

Mr. Fraley advised that the staff will see what data is available and report to the Commission.

Mr. Dale Turner, Mayor of the City of Livermore, spoke in regard to the City's comments in regard to the Northbluff Draft Environmental Impact Report. (A copy of the letter is on file and was furnished to each member of the Planning Commission.)

Mayor Turner commented that the City of Livermore has been responsive to the needs of people during the last two to four years, they have met the average of cities in Alameda County in regard to growth and they are not a no-growth city.

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3. NORTHBLUFF (cont'd)

He also spoke of the planning expense by the City for the airport; he felt it would be irresponsible to foreclose the plans for the airport and the surrounding area. He said that the City has included the Northbluff in their plans and are looking forward to development of that as an industrial park to provide construction and permanent jobs in the years to come. He described the program of the City of Livermore in regard to moderate and low-income housing.

Commissioner Shockley asked if the City would approve of this proposal if it were to develop as industrial or if it were to be developed under the City of Livermore Mayor Turner replied affirmatively.

Chairman Douglas asked if a mix of industrial with some housing and provisions for affordable housing would be acceptable to the City.

May or Turner replied that the problem of the City is housing around the airport. He said that they have sufficient land in the City zoned for residential use.

Commissioner Warren asked why they would want industrial and not residential.

Mayor Turner indicated that they have received a lot of interest in developing the area around the airport in an industrial mode; they sincerely believe it is too close to the airport for residential homes; the property is really separated from necessary services and would constitute a leapfrog development.

Commissioner Spiliotopolous asked for an explanation of the ability of the City to provide sewer services for industrial and not residential.

Mayor Turner replied that capacity has been reserved in the pipeline for industrial development.

Commissioner Spiliotopolous moved continuance to February 1, 1982, at 6 p.m. Seconded by Commissioner Sutherland and carried.

4. Referral from the Alameda County Flood Control District for a Plan Conformance Report pursuant to Section 65402 of the California Government Code for proposed improvements to a portion of the Sulfur Creek drainage system near "E" and 5th Streets in the Hayward area.

5. Annual investigation and report by the Building Official on permit compliance for SMP-3, surface mining permit of Joseph Telles and Redwick Construction Company, located on a 125-acre site on the west side of I-680 Freeway, opposite the intersection of Sheridan Road, Sunol Valley area.

Chairman Douglas asked if there is comment on either of the two consent calendar items.

There was no one present desiring to speak concerning these consent items.

Commissioner Shockley moved approval per the staff recommendation. Seconded by Commissioner Warren and carried.

6. 1503rd ZONING UNIT - James & Teresa Miller and Robert & Janette Rae - Petition to reclassify one parcel containing approximately 7,827 square feet, located at 3996 Somerset Avenue at the northwest corner of Redwood Road and Somerset Avenue from the R-1 (Single Family Residence) District to the R-2 (Two Family Residence) District, Castro Valley, unincorporated Alameda County and bearing County Assessor's Designation: Map 84B, Block 590, Parcel 26.

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4. SMP-12 - Application of REDGWICK CONSTRUCTION COMPANY for approval of Surface Mining Permit and Reclamation Plan, SMP-12, to mine an approximately 40 acre portion of a 345 acre site (owned by Maria Andrade, et. al.) for clean fill material, located easterly of and with access from Tassajara Road, two miles northerly of I-580, unincorporated Alameda County.

This matter was continued to February 16, 1982 without testimony.

5. ANNUAL STATUS REPORT - SAN LEANDRO ROCK COMPANY SMP-1 - Annual report from the Building Inspection Department on status of compliance with permit requirements of SMP-1 (San Leandro Rock Company) allowing processing and removal of 1 million cubic yards of material from a 60+ acre site located at 13575 Lake Chabot Road, San Leandro area, unincorporated Alameda County.

The report was accepted. Commissioner Shockley noted that this is a very well done and attractive reclamation project.

6. Approval of minutes of January 4, 1982 and January 18, 1982.

The minutes were approved as mailed.

7. 1389TH ZONING UNIT - NORTHBLUFF, BROADMOOR DEVELOPMENT COMPANY to reclassify from the A (Agriculture) District to the PD (Planned Development) District, to permit development of 1,750 housing units a 6-acre commercial area, an elementary school, a sewage disposal system and a recreation center, on a 393 acre site located north of Interstate 580, between Doolan Canyon Road on the west and Collier Canyon Road on the east, northwest of Livermore, unincorporated Alameda County.

Mr. Deutsch presented the staff report. He advised that the State Clearing House did not receive copies of the Draft EIR, additional copies have been sent to them, but the delay in receipt requires that the review period be extended, therefore, the staff would recommend continuance to March 15, 1982 to enable preparation of the final EIR and the staff recommendation.

Commissioner Shockley stated that she is interested in the issue of the cost of building housing in areas where there is no infrastructure versus the cost of building where there are existing municipal services. She asked what record the Broadmoor Company has for infilling in areas that do have infrastructure.

Mr. Barry Whittaker of Broadmoor Development Company indicated that they would be happy to furnish the Commission with information concerning projects that they have built as an infill nature as opposed to expansion.

Commissioner Shockley noted that in the EIR it was stated that it was inefficient to build outside the City of Livermore. She asked if Broadmoor could come in with information of construction-based on the criteria of infill with municipal and all services presently available at the time of construction, or building and providing all services from scratch.

Commissioner Shockley also asked the status of the assessment of the impact of the airport on this proposed development.

Mr. Deutsch advised that as a mitigation measure one of the agencies listed possibly obtaining noise easements. He said that the staff has found,

7. 1389TH ZONING UNIT - NORTHBLUFF, BROADMOOR DEVELOPMENT COMPANY (cont'd.)

however, that no plans or measurements have indicated that noise would be a problem and there is a question of whether or not there was a basis for the recommendation. He advised that the existing plans of the airport are somewhat out of date and this proposal has forced the County to look at the future of the airport.

He indicated that the final EIR will attempt to determine the difference in cost to the home owner between development under the City of Livermore and development under county service area.

Ms. Margaret Tracy of Madison Avenue in Livermore raised the question of internal consistency of the project with the County general Plan and ABAG Regional Plan. She said that both plans have policies that say that new cities should come from existing communities wherever possible. She asked how this project can even be considered. She believed that internal consistency is a legal mandate and that the development would constitute a leap frog development. She indicated that the development is premature.

Ms. Tracy indicated that she is a member of the Zone 7 Board and the Board is to protect the underground water supply which supplies one-third of the Valley's municipal water. She asked that the Commission wait until policies have been formulated by Zone 7 and brought before the Commission in regard to protection of the underground water basin and waste water management. She believed that the report now under preparation will be finalized by June and she felt that land disposal of effluent is not the way to go unless there is 100 percent demineralization.

Commissioner Spiliotopoulos asked if the City of Livermore is meeting the standards.

Ms. Tracy believed that the City of Livermore is not observing the standards that have been set, and that DSRSD is observing the standard. She read a report from PG&E which said that new development forces rate increases.

She referred to Item 19 and 20 of the Summary EIR.

Commissioner Bernhardt commented that LAFC has already decided that this area is outside the jurisdiction of the City of Livermore and the applicant is proposing a tertiary treatment which means that the water is cleaner than what comes out of the municipal system.

Commissioner Spiliotopoulos indicated that the pipe line was constructed so as to place a growth constraint on Pleasanton and Livermore.

Ms. Tracy indicated that she was speaking as an individual and not as a representative of Zone 7.

Mr. Jack Stear, resident outside the City of Livermore, said his concern is regarding the Livermore Airport. He believed that the Airport Commission would want to make a presentation concerning this development. He spoke of the problems relating to noise that might arise if the airport becomes a nuisance to the residents of the proposed development at some time in the future. He supported the concept that the most appropriate use around the airport is industrial.

Mr. Carl West, property owner on Collier Canyon Road read a prepared statement, spoke of problems that would be annoying to the future population of Northbluff including noise from planes. He noted that this is a rural area and he was told by County Staff that the property adjacent would be too

7. 1389TH ZONING UNIT - NORTHLBLUFF, BORADMOOR DEVELOPMENT COMPANY (cont'd.)

steep for development. He believed that spraying of effluent on the hill adjacent to his property would cause problems for him. He was concerned that the effluent not contaminate his newly installed well water, and about being a resident of the area at the northeast end of the property when wind is a factor. He asked that the Commission not let this development become history when these problems exist. He was also concerned about the statement that the impact will be greatest on the residents. He felt that their property values are in jeopardy as well as their reason for moving to the country.

Ms. Barbara Stear, resident on Wetmore spoke as a student pilot flying out of the Livermore Airport. She indicated that when you take off from the Airport you fly right over this area proposed for development. There was no one else present desiring to speak.

Commissioner Shockley moved continuance to March 15, 1982.

Seconded by Commissioner Warren and carried.

8. 1504TH ZONING UNIT - DAVID & LINA McPEAKE, petition to reclassify six parcels containing approximately 2.3 acres, located at 708 through 722 Marin Avenue southside, from the R-S-D-3 (Suburban Residence, 2700 sq. ft. m.b.s.a.) District to the R-4 (Multiple Residence) District, Hayward area, unincorporated Alameda County and bearing County Assessor's designation: Map 432, Block 44, Parcels 29-1, 29-3, 29-4, 30-3, 30-5, and 30-6.

Mr. Dean McPeake of 708 Marin Avenue, Hayward, advised that the purpose of this application is to bring the use into conformity with the zoning laws. He said that they do not give out medications and they do not provide care for the residents of the facility as they formerly did. He said that they now maintain a facility for people who are trying to go from board and care facilities to an apartment. This facility would be a middle ground, and the residents would leave this facility to go to their own apartments.

There was no one else present desiring to speak.

Commissioner Spiliotopoulos moved continuance to February 16, 1982.

Seconded by Commissioner Shockley and carried.

9. 1506TH ZONING UNIT - WENTE BROTHERS - petition to reclassify approximately twelve acres of a larger parcel of 238.41 acres from the A (Agricultural) District to a PD (Planned Development) District, allowing a brewery within an existing winery complex located at 5050 Arroyo Road (Cresta Blanca Winery), southeast side, approximately 1.75 miles south of the intersection with Wetmore Road, Livermore area, bearing County Assessor's No. 99-600-1-2.

Mr. Wallace presented the staff report. He noted that the staff has been in contact with Zone 7, RWOCB, and Health Department who see no problems with the proposal. He recommended that the Commission take public testimony and if there is no significant testimony to the contrary adopt the attached resolution recommending to the Board of Supervisors that subject property be reclassified to a PD District with uses and provisions as described in the resolution.

Mrs. Stear of Wetmore Road asked why a rezoning would be necessary to conduct a brewery on this property if it is not necessary to conduct a winery.

Commissioner Tully advised that is as provided by the law.

Mrs. Stear asked if anything would be grown on the property or will all the ingredients have to be imported to this site. She also was interested in knowing what will happen to the waste from the brewery and was interested

IV. PLANNING DEPARTMENT STAFF COMMENTS ON WRITTEN RESPONSES RECEIVED

A. Response of Pacific Gas & Electric Company:

"On page 39, it is stated that 'presently solar energy is best suited for space and water heating'. Actually, from the standpoint of cost-effectiveness, solar energy is 'best suited' for swimming pool heating. The next most cost effective application is probably the heating of domestic hot water. However, active space heating applications are still, at best, marginal with respect to rate of return on investment."

Comment: We appreciate the clarification. EIR text is hereby modified accordingly.

"The third paragraph on page 41 mentions that 'PG&E will now investigate the wind energy potential of a site...' In general, PG&E does not provide this service to private developers. the California Energy Commission will loan the necessary equipment."

Comment: We appreciate the information EIR test is hereby modified accordingly.

"...on page 42, the report makes reference to 'PG&E's Energy Conservation Home Program'. This program has been discontinued and has been replaced with the Suntherm Home Program "

Comment: EIR text is hereby modified accordingly.

B. Response of Collier Canyon Road residents: A Petition

Comment: The residents agree with the EIR and no further comment appears necessary.

C. Response of Mr. and Mrs. Carl F. West:

"What is to be done about the treated sewage waste water overspray from the waste water disposal site?"

Comment: Treated wastewater, or effluent, would be used to irrigate pasture and landscaping in the area. During the dry months of the year there should not be any "over spray", meaning excessive spraying causing surface runoff. During the rainy season when irrigation would not be needed, effluent would be stored in the proposed seasonal storage reservoir to prevent "over spray". or runoff

In the event of runoff, the project calls for the construction of small dams to contain the runoff and control any erosion. The excess effluent would be returned to the seasonal storage reservoir for later use.

While it is true that treated wastewater can have toxins which may cause plant growth problems, these possible toxins generally originate from industrial sources. Because wastewater from the Northbluff Development would not include any industrial contributions but rather would be domestic in nature, no such problems are anticipated.

Increasing salt levels from applied reclaimed water can be a problem for plant growth if the salts are not removed. The proposed wastewater treatment facility will include an advanced level of treatment including the reverse osmosis process, which is a method of desalination. By removing much of the

salts from the wastewater, accumulation of salts is prevented. The Livermore wastewater treatment plant currently has no facilities for reducing the salts level of its effluent.

"What effect will the overspray have on our farm animals. . . from eating grasses sprayed with waste water or from breathing the mist? What effect does sewage waste water overspray have on people...?"

Comment: The California State Department of Health regulates the treatment and effluent quality of wastewater that is to be reclaimed and reused under the provisions set forth in Title 22 of the Administrative Code. The main purpose of these regulations is public health and safety. All reclaimed wastewater from the Northbluff Facility would be required to conform to the Title 22 restrictions. Included in these treatment measures are filtration and disinfection with chlorine. In order to contain possible aerosol travel from spraying, a buffer zone is proposed around the development to surround and isolate the area being irrigated to contain any spray or mist. This buffer zone and the expected high quality of the reclaimed water should assure that local residents and livestock would not be subject to health or safety risks because of the irrigation project.

As far as any potential hazards to livestock eating grasses irrigated with reclaimed water, these hazards generally result from heavy metals and other wastes from industrial dischargers. This should not be a problem for this project due to the area's lack of industry. Irrigation of pasture lands with reclaimed water is regulated by Title 22.

"What is to be done about the sewage waste water odor?"

Comment: Wastewater treatment facilities from time to time can be sources of odors. In order to minimize odors, the proposed plant would be designed to include the latest state-of-the-art odor control equipment. Activated carbon filters and/or chemical scrubbers are quite successful in treating odorous exhausts. In addition, the treatment processes which are potential generators of odors would be enclosed and ventilated by exhaust fans and odor control equipment.

Generally, odors are the result of septic, or anaerobic, conditions in the plant. The plant would be designed and operated to provide an adequate air supply to maintain aerobic conditions. The plant would be designed with standby aeration equipment and its own electrical generator to supply emergency power.

"What assurances can you give us that the wastewater disposal area (evaporation ponds) will not leach treated waste water into our new water source? Will this cause nitrate to leach into our wells?"

Comment: The evaporation ponds would be sealed with an impermeable clay layer or plastic liner to prevent exfiltration of the stored brine.

Groundwater supplies would be protected by utilizing the most advanced, yet proven state-of-the-art technology for wastewater treatment and reclamation. Filtration and reverse osmosis are widely used methods of advanced waste treatment and demineralization. The system would be designed and operated to produce an effluent TDS level equal to or lower than that of the local potable water supply.

TABLE VIII-6

TYPICAL VALUES OF CROP UPTAKE OF NITROGEN

<u>Crop</u>	<u>Nitrogen Uptake lb/acre-year</u>
Forage Crops	
Alfalfa	200-480
Coastal Bermuda Grass	350-600
Kentucky Bluegrass	180-240
Bromegrass	116-200
Reed Canary Grass	300-400
Sweet Clover	158
Tall Fescue	135-290
Quackgrass	210-250

Source: EPA Technology Transfer, Process Design Manual for "Land Treatment of Municipal Wastewater", EPA 625/1-77-008, October, 1977.

The level of nitrates (as nitrogen) expected in the effluent is below the Basin Plan Municipal Threshold Concentration and Title 22 Domestic Water Quality levels. The project development plan proposes to provide further nitrate uptake by planting the specific types of grasses that exhibit exceptionally high nitrate removal. Plant uptake of nitrates and overall TDS reduction should prevent any salts accumulation and degradation of the groundwater quality.

Based on a projected final effluent quality of 6 milligrams per liter nitrates (as nitrogen), approximately 20 pounds of nitrogen per day would result from application of the reclaimed water. Using a disposal area of 150 acres, the nitrogen loading rate would be approximately 50 pounds/acre/year. This loading rate would be significantly lower than the potential nitrogen uptake rates of many forage crops. The attached Table VIII-6 from the Engineering Report presents a summary of typical values of nitrogen uptake for various crops.

To further insure that the groundwater quality is not harmed, the project plan specifies that a groundwater quality monitoring system be established. By periodic sampling and testing of the area's groundwater and soils within the spray disposal areas, it would be possible to detect any changes in the earliest stages in order to enact the appropriate corrective measures. These could include an expansion of the reverse osmosis process for increased demineralization capacity.

D. Response of DKS Associates:

Comment: We apologize for any confusion the misnumbering of tables in the Transportation/Circulation section may have caused. Corrections should be made in the text as noted in the DKS letter and as outlined in the errata at the beginning of this document.

E. Response of Livermore Area Recreation and Park District:

"It is also not clear how many public parks are proposed for the development."

Comment: The Site Plan shows two public parks connected by a public trail system, totalling 9.6 acres. References to a single 9.6 acre park were simplifications used for fiscal analysis purposes. The Site Plan should be considered flexible; park layouts and acreages may change. It also should be noted that the Subdivision Ordinance provides for dedication and/or payment of fees in lieu of dedication for improvement of parks at the discretion of the Advisory Agency based on recommendations of the park district.

"The statement indicating possible negotiations to arrive at reimbursement for a portion of the park improvements (page 74) is not understood and needs further discussions."

Comment: The statement refers to possible payback by the District to the developer of capital improvements to on-site parks after predicted surplus property tax revenues accrue to the District. Such an arrangement would have to be agreed to by LARPD and is unlikely.

"The Board desires a detailed breakdown showing how the build-out revenue of \$229,041 (page 101) for LARPD was determined. . . The Board also questions the validity of the maintenance cost projection of \$58,000 and the net surpluses ranging from \$48,090 to \$171,040. These projections are based on

TABLE 1

LIVERMORE AREA RECREATION AND PARK DISTRICT

Costs and Property Tax Revenue

	<u>1982/83</u>	<u>1983/84</u>	<u>1984/85</u>	<u>1985/86</u>	<u>1986/87</u>	<u>1987/88</u>
<u>Revenue:</u>						
Property Tax Collected	43,690	106,090	160,330	184,710	226,390	229,040
Less: Contributions to Special District Augmentation Fund ²⁾	(21,850)	(53,050)	(80,160)	(92,360)	(113,200)	(114,520)
Plus: Allocation from Special District Augmentation Fund ²⁾	19,660	47,740	72,150	83,120	101,880	103,070
Net Property Tax Revenues	41,500	100,780	152,320	175,470	215,070	217,590
<u>Cost:</u>						
Park Acres	3	6	9	12	15	17.5
Cost @ \$6,000/Acre	18,000	36,000	54,000	72,000	90,000	105,000
Revenue/Cost Balance	+ 23,500	+ 64,780	+ 98,320	+ 103,470	+ 125,070	+ 112,590

1) Dollar amounts shown are in dollars of 1980/81 (average) purchasing power.

2) Allocations to LARPD from the Special District Augmentation Fund have averaged 90% of LARPD's contribution to the Fund, over the last three fiscal years.

providing only 9.6 acres for a neighborhood park. . .Increasing the acreage to meet the County park land dedication requirements would increase the maintenance costs and reduce the so called surplus."

Comment: Revenues accruing to LARPD were estimated based on the percentage share of the adjusted pre-Proposition 13 tax rate, 13%. Total assessed value for the project at buildout was estimated at \$43,102,000, which yields \$229,040 for LARPD at the rate of \$0.5314 per \$100 assessed value.

The Livermore Area Recreation and Park District (LARPD) raised questions regarding parkland dedication requirements. If Alameda County park dedication requirements were applied literally to the site, there would be 17.5 acres of park land, compared with the 9.6 acres indicated in the development plan. A total of 9.6 acres of developed park land was used in the fiscal analysis. An increase to 17.5 acres would add 82% more park area in Northbluff, and a corresponding increase in park maintenance costs.

Property tax revenue projections must consider funds available directly from property tax collections plus funds from the Special District Augmentation Fund, which are allocated at the discretion of the Board of Supervisors. The Augmentation Fund receives 50% of the LARPD property tax revenue. Historically, the Board has returned 90% of these funds to the District.

Park maintenance costs of \$6,000 per acre were used to estimate total annual cost, based on McDonald & Associates' experience in comparable areas. The LARPD tentatively accepts this estimate, but is currently doing an in-house analysis which may produce an alternative cost estimate.

The accompanying table evaluates the LARPD revenue/cost balance if 17.5 acres of parks are phased in over time.

F. Response of John Stein:

"The part of the EIR dealing with brine disposal seems incomplete. Where will the 330,000 pounds per day of brine be dumped?"

Comment: Based on the engineering analysis, it is estimated that approximately 40,000 gallons per day of brine would be wasted from the reverse osmosis process. This brine would be stored on-site in three one-acre ponds where it would be concentrated by approximately 25 percent by evaporation. The concentrated brine would be hauled from the site in a tank truck. It is anticipated that the concentrated brine would ultimately be disposed of in a sanitary sewer system which discharges into San Francisco Bay.

"What are the possible impacts of the 3 acre brine storage ponds? What facilities will be needed to load and empty the trucks? What is the impact of five or six round trips per day of very large trucks, and what is their energy use?"

Comment: Impacts of the brine storage ponds would be minimal. The San Francisco Bay Regional Water Quality Control Board prohibits exfiltration of any high salt concentrated water. The ponds would be sealed to prevent brine leakage by either an impermeable clay layer or by heavy bonded plastic liners.

Tank trucks would haul the concentrated brine out of the Valley. The hauling operation is planned for approximately five trips/day during eight hours/day and five days/week. A small pump, piping and flexible hosing would be used to transfer concentrated brine into the tank truck. The truck would be equipped with its own drainage line for discharging each load of brine.

Trucking the brine to disposal would result in limited increases in noise and fuel consumption. However, concentrating the brine by evaporation would limit the number of trips required, which in turn would reduce impacts. It is estimated that the diesel fuel consumed annually for trucking brine would be approximately 7,500 gallons.

"The technology of reverse osmosis is new and relatively unproven on this scale. Considering the possible large and unmitigatable effects of a failure a trial operation would be advisable before the project is built..."

Comment: Although reverse osmosis is a relatively new technology, it has been used successfully for several years at similar facilities in California including San Diego Country Estates operated by Ramona Municipal Water District, Kirkwood Meadows operated by El Dorado Irrigation District, and Water Factory 21 operated by Orange County Water District.

Dr. Perry McCarty, professor of environmental engineering and Chairman of the Civil Engineering Department at Stanford University, has recently completed an extensive study on Water Factory 21 product water over a period of five years.

Because years of data and operating experience exist at similar installations, the high costs for a large pilot operation at the Livermore Plant do not appear to be warranted.

G. Response of Livermore Valley Unified School District

"On page 3, the total number of students shown in Table 1, 850, is not consistent with the total number of students shown on page 69."

Comment: The number of students shown in Table 1 was based on generation factors which took each type of housing unit proposed into account; factors are much less for multiple units. The number of students shown on page 69 was based on generation factors which assumed all units were single family detached. The actual number of students generated by the project at buildout can be expected to be somewhere in between the two figures (850-1138).

"On page 70, the following statement appears:

'Construction of a new school on the site at the same time the School District is faced with closing schools located closer to central Livermore would be an inefficient use of resources.'

This statement is not true. A reasonable relationship cannot be drawn between the need for a school in the Northbluff area, and the closing of a school in the City of Livermore. It is not practical to require elementary school children to travel to a school site many miles from their neighborhood, across a major freeway. The paragraph immediately preceding the quoted paragraph on page 70 of the report adequately explains why a school site in Northbluff is needed, irrespective of the closing of schools in the City of Livermore. The quoted paragraph above should be deleted from report."

Comment: The report does not mean to suggest that a school would not be needed at Northbluff, if Northbluff is developed. The paragraph referred to is intended to mean that the Northbluff project would be inefficient compared to a project within the service area of an existing elementary school which might otherwise be closed. The point is not the need for a school in Northbluff, but rather the inefficiency of the Northbluff project because it would require construction of a new school.

H. Response of David W. Carpenter, consulting engineering geologist:

"As the DEIR states, longer term impacts associated with the operation of the proposed sewage treatment plant are uncertain because of the limited information concerning sustained performance of similar systems...a gradual accumulation of salts other than nitrates is likely with time because of the properties of the formations underlying the planned spray disposal areas. Adverse effects upon plant growth could follow leading to reduced nitrate uptake. As a partial mitigation for this potential problem, it is suggested that the water quality monitoring system described in the DEIR be expanded to include periodic soil sampling and analysis within spray disposal areas, in order to provide early warning of adverse geochemical changes..."

Comment: We concur with Mr. Carpenter's remarks. Buildup of salts in the soil is of great concern because it could interfere with plant growth, thus potentially interfering with any crop management program to reduce nitrate buildup. The EIR is hereby modified to include this impact and partial mitigation measure.

I. Response of City of Livermore:

Many of the City's remarks serve to emphasize statements in the Draft EIR, or to set forth the City's position, and require no additional comment, City comments #1, 2, 6, 7, 8, 11, and 12 fall into these categories.

"The mitigation measures (for air quality impacts) listed on page 36 do not alleviate the fact that because of the project's location significant automobile travel is going to be needed to get to schools, shopping centers, places of employment, and entertainment, etc."

Comment: We concur; air quality impacts are unavoidable, as noted in the DEIR.

"It is not reasonable to assume that the energy required for transportation will be reduced because of a BART extension out to the Livermore-Amador Valley (page 42). A BART extension out to the Livermore-Amador Valley is still a long-term possibility."

Comment: The Draft EIR makes no such assumption; it simply pointed out that if BART is extended to the Valley, then some of the transportation energy inputs might be lessened.

"The discussion concerning Transportation and Circulation...should include consideration as to how the major streets in the development would connect with the City's circulation system. Further, this section makes no mention of the City of Livermore's public transportation system--RIDEO—which could impact upon the proposed development since RIDEO already has a line going right through the proposed project serving Chabot College."

Comment: The major roadway through the development, Collier Canyon Road, will connect with Airway Boulevard across I-580; this will provide connection of the development with Kitty Hawk, Las Positas and other city streets. Provisions are made to allow a future extension east to Las Positas New Town and Livermore Avenue.

Impacts on the RIDEO program are presented in Section II.D. of this Addendum, a new section entitled "Transit Impacts".

"The Draft Environmental Impact Report indicates the proposed development would experience noise impacts from the Livermore Airport...No significant measures are offered to mitigate this impact."

Comment: Normal construction would alleviate airport noise impacts indoors, even with windows open. Outdoor noise would not approach adverse levels, based on best available current information. The DEIR noted that individual flyover events may be annoying, and unmitigable.

"The Draft Environmental Impact Report should state that the Northbluff project does not conform to the objectives in the County's General Plan..."

Comment: Pages 81-84 of the Draft EIR discusses County General Plan policies.

"The statement is made that revenue sharing for cities and counties has strong political support and can be expected to continue. Recent news releases, however, indicate that the current administration may reduce revenue sharing for cities and counties and this position has some political support."

Comment: Any reduction in revenue sharing would affect all areas of a city or county. The DEIR made some assumptions and presented them explicitly in attempting a fiscal analysis of the project. It would be unrealistic and unwieldy to modify or include additional assumptions based on political possibilities of the moment.

"The statement is made that residents in the City of Livermore's Springtown area receive a chronic shortage of City services..."

Comment: We apologize for this typographical error. The sentence should read that Springtown residents perceive shortage of City services, as stated in the City of Livermore's own Position Summary on the Northbluff project.

J. Response of Doolan Road Partnership (S.D. Bloom):

"How are we to be protected from additional assessments which may arise with the setting up of a special CSD (Community Service District) or CSA (County Service Area)?"

Comment: Assessments only apply to properties within a CSD or CSA. Such districts have distinct and precise boundaries. If the Northbluff district boundaries were set up to include Northbluff property only, then your property would not be subject to any assessments within the district. However, it is possible that the district could be established to include your property, even against your wishes. You would have to argue your case before the Board of Supervisors if it appeared that your property was going to be included.

"In your April 28, 1981 letter to us you mention the possibility of the proposed project influencing future land-use decisions on our property. This to us is rather ominous as the change of our land from the agricultural preserve status to anything else would make our tax burden completely unbearable. How are we protected in this case?"

Comment: The Draft EIR describes (pages 112-113) how adjacent lands could be affected by the project. Your property may be affected by pressures for development. As long as agricultural preserve status is maintained, your taxes will be figured on an agricultural income basis. The Board of Supervisors can unilaterally non-renew a preserve contract, which would mean expiration in 10 years, but this action would be unlikely in your case. Your taxes will be figured under preserve methods for at least 10 years unless you choose to cancel the contract.

"...plans for a local tertiary sewage treatment plant are very much in the developmental stage. Considering the unproven nature of the sewage plan how are we to be protected from possible damage from such an effluent spray right in our immediate vicinity?"

Comment: It is true that the proposed Northbluff Wastewater Treatment Plant is in the planning stage. The plant is merely one part of the entire development which is also in the planning stage. Detailed planning and design of the treatment facilities would begin only after concept approval is received.

Reverse osmosis is an advanced water treatment process and has been proven to be an effective demineralization process. The proposed Northbluff facilities would be similar to systems currently in operation at the Ramona Municipal Water District for San Diego Country Estates, at the El Dorado Irrigation District at Kirkwood Meadows, at the Orange County Water District at Water Factory 21, and those facilities presently under construction for the Otay Municipal Water District. Reverse osmosis would remove the threat of salts accumulation and groundwater contamination and allow the reclamation of highly treated effluent for beneficial uses.

The California State Department of Health regulates the treatment and effluent quality of wastewater that is to be reclaimed and reused under the provisions set forth in Title 22 of the Administrative Code. The main purposes of these regulations are public health and safety. All reclaimed wastewater from the Northbluff Facility is required to conform to the Title 22 restrictions. Included in these treatment measures are filtration and disinfection with chlorine. In order to contain possible aerosol travel from spraying, a buffer zone is proposed around the development to surround and isolate the area being irrigated for containment of any spray or mist. This buffer zone and the expected high quality of the reclaimed water governed by the State should assure that local residents are not subject to health or safety risks.

"We would be grateful to learn what provisions there are in the Livermore-Amador Valley Planning Unit of the General Plan regarding our land..."

Comment: Your land is designated Agricultural. Lands covered by the Northbluff project were designated for Residential use by the Board of Supervisors in 1977 at the property owner's request.

K. Response of Planning Commissioner Sid Sutherland:

"In the EIR the staff raised concerns about threats to the ground water basin from operation or failure of the sewage treatment system. Some area residents also mentioned this concern. Yet at the January 4 workshop, the Zone 7 Manager read from a letter stating that the Regional Water Control Agency had given a preliminary approval of the proposed treatment system. This would seem to suggest that the threats have been exaggerated. First, I think that the Regional Water Agency's letter should be included in the EIR. Second, their opinions should be given at least equal weight to those of the staff in the EIR."

Comment: The Regional Water Quality Control Board's letters are included in this Addendum. The staff did not include its own opinions in the EIR regarding the sewage disposal system; all statements in those sections came from staff's consultation with the Regional Board, Zone 7, the consulting engineering geologist, and the wastewater management consultant. The Regional Board did not respond to the Draft EIR because they feel it adequately assesses the proposed treatment system and its impacts; thus, there is really no discrepancy between Planning Staff and the Regional Board staff. Also note that the August 10, 1981 letter by the Regional Board's Executive Officer outlines some concerns, and that the subsequent August 27, 1981 letter discusses even more serious reservations about the effluent irrigation/crop management plan. To date, applicants have not responded to the questions raised in the August 27, 1981 letter.

Regarding whether threats to ground water were exaggerated in the Draft EIR, none of the technical agencies reviewing the DEIR have suggested that potential impacts contained therein have been overstated. On the contrary, reviewing agencies have tended to reiterate and/or reinforce the EIR's analysis (see comments of Zone 7, Alameda County Water District, and David W. Carpenter, consulting engineering geologist).

"It is my understanding that the City of Livermore uses treated sewage to water the grass at their Las Positas Golf Course. I think it would be appropriate for the EIR to: (a) Compare Livermore's demineralization systems to the Northbluff proposal; (b) Compare Livermore's impact on the ground water to that expected from Northbluff; and (c) Compare the risks of failure of Livermore's Treatment Systems (on the ground water or on the Bay through the export pipeline) to the risks of failure at Northbluff."

Comment: Presently the City of Livermore uses filtered secondary effluent to irrigate the Las Positas Golf Course. The City's treatment system includes biological treatment, secondary clarification, filtration, and chlorination. The Livermore system has no demineralization facilities to reduce the salts level in the reclaimed water.

The level of treatment at the proposed Northbluff Plant would be more advanced than that of the existing Livermore Plant. The proposed Northbluff Plant would include reverse osmosis facilities to demineralize the filtered secondary effluent.

Because the Livermore Plant includes no desalination facilities, it seems that reclaiming its effluent could cause an overall salts accumulation.

Groundwater contamination is not expected to occur with the proposed Northbluff Facility. Because the plant would include reverse osmosis, there should be no salts accumulation. The expected TDS of the Northbluff Plant effluent should be equal to or lower than that of the local potable water supply.

With respect to nitrate removal, the Northbluff Plant again would have a more advanced treatment system than the Livermore Facility. Reverse osmosis can be quite effective in nitrate removal. Further nitrate removal is anticipated with uptake during plant growth.

Regarding the risks of plant failure, if the Livermore Plant experienced an upset, the resulting effluent quality could range from raw sewage to filtered secondary effluent. A serious failure would most likely cause reclamation to cease and the lower quality effluent would be discharged to San Francisco Bay via the export pipeline.

If the proposed Northbluff Plant experienced an upset, the resulting effluent quality could range from raw sewage to demineralized filtered secondary effluent. Lower quality effluent would be discharged to the storage reservoir. Significant dilution would occur as the lower quality effluent is blended with the normal high quality effluent and during the 35-day detention period in the reservoir.

The probability of failure at either the Livermore or Northbluff Plants is relatively low and depends on a number of factors such as mode of operation, equipment maintenance, operator attention, and contribution of toxic wastes.

It seems reasonable to assume that the two facilities would be fairly equal on the basis of operator attention and equipment maintenance. The proposed Northbluff Facility would feature the extended aeration process which has been shown to be one of the most stable of biological treatment systems. Operated as such, shock loads should have minimal impact on effluent quality. Because the Northbluff development is not planned to include industrial waste dischargers, the chances of the plant being upset by toxic elements is greatly reduced.

"The Staff has made much of some liability to the County due to creation of a CSA or CSD to operate the sewage treatment system. I am not aware of any such calamities where the County has had to accept legal or political responsibility for a portion of the costs. Have there been any?"

Comment: Concern over potential County liability came from the County Administrator's office, which expressed preference for a CSD (Community Services District) rather than a CSA (County Service Area) so that any liability would be assumed by a separately elected district board of directors rather than the Board of Supervisors. Since a CSA has never been used in Alameda County to operate a sewage treatment system (the Nipper project on Pleasanton Ridge, Rancho Sunol Estates which proposed a CSA-operated discrete sewage treatment system, was turned down by the Board of Supervisors in 1980), no liability has been incurred to date. A CSD, of course, was used when Dublin was created and Valley Community Services District (now Dublin-San Ramon Services District) was formed to provide sewage treatment services, among other services. DSRSD encompasses over 7700 housing units plus extensive commercial and industrial development to support the costs of its services. The concern is that Northbluff, with only 1750 residences, may be financially strained to provide costs of necessary operations and maintenance of the proposed facilities.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION
1111 JACKSON STREET, ROOM 6040
OAKLAND 94607Phone: Area Code 415
464-1255

1981 AUG 12 PM 2:51

ALAMEDA COUNTY PLANNING August 10, 1981
DEPARTMENT 2199.9094(SIM)

Mr. William H. Fraley,
Planning Director
Planning Director
Alameda County
399 Elmhurst St.
Hayward, CA 94544

Dear Mr. Fraley:

Subject: Revised Wastewater Management Plan for Northbluff

We have reviewed the revised wastewater management plan for Northbluff as described in the attached letter from Lowry and Associates dated August 7, 1981. We find the plan generally feasible. The proposed demineralization/blending waste treatment process will remove Northbluff's incremental Total Dissolved Solids (TDS); nitrates are to be removed by a yet-to-be finalized crop management program. Northbluff's revised wastewater and crop management plans will substantially mitigate the water quality impacts due to the development.

Our review and finding of feasibility indicate some concerns that the County should be aware of during deliberations on this development proposal. Some of these concerns were previously transmitted to you on March 23, 1981, as part of our review of the County's policy on "Processing Responsibilities for Establishing Discrete Sewerage Systems and County Service Areas."

1. The finding of "generally feasible" is only a staff finding. However, based upon the information currently available, the proposal to remove incremental TDS and nitrates with the processes described would permit me to recommend the Regional Board's adoption of waste discharge requirements. This recommendation could be changed based upon later information (e.g. Zone 7 study, environmental documents, Board Policy compliance, etc.).
- The Regional Board would consider the proposal upon submittal of a complete Report of Waste Discharge and environmental documents by the governmental entity that will be responsible for the waste treatment and disposal facilities. The Board will consider my recommendation and other testimony and recommendations when they adopt requirements at a public hearing. In addition Zone 7 can adopt stricter requirements.
2. The type of waste treatment system now proposed is significantly more sophisticated to operate. It is also energy intensive and more costly to build and operate than the system previously proposed. The economic impacts to future homeowners of the proposed system is of concern to the Board. Past experience indicates that high cost systems, especially when compared to nearby systems, are often subject to cost-cutting measures (e.g. deferred maintenance) that forebodes future problems that may lead to enforcement by the Regional Board.

Page 2.

Mr. William Fraley
August 10, 1981

3. We acknowledge that the findings of the Zone 7 Wastewater Management Study may recommend different waste loadings at Northbluff than those now proposed by the developer's consultant.
4. It should also be noted that the revised proposal indicates removing the incremental TDS even for higher TDS potable waters (e.g. 500 mg/l) to insure no TDS increase in the effluent over potable waters. Future potable water supplies could also be of lower TDS concentrations than present supplies (i.e. implementation of the Peripheral Canal). The Board may also consider waste effluent requirements to meet these lower limits to insure no TDS increases caused by the development's wastes. This may mean higher, future costs for the proposed system.

If you have any questions, please call Steve Morse at (415) 464-0618.

Sincerely,



FRED H. DIERKER
Executive Officer

Attachment

cc: Mun Mar, Zone 7
Garry Lee, Lowry and Assoc.
Barry Whittaker, Broadmoor Homes

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION
1111 JACKSON STREET, ROOM 6040
OAKLAND 94607

Phone: Area Code 415
464-1255



2199.9094(SIM)
September 8, 1981

Mr. Adolph Martinelli
Alameda County Planning Department
399 Elmhurst St.
Hayward, CA 94544

Dear Mr. Martinelli:

Subject: Northbluff

Angus McDonald and Associates response of August 12, 1981, does not provide assurance to Board staff that the costs for the necessary crop management and harvesting plan for the wastewater disposal areas are known. This same question was also asked on review of their (Northbluff's consultant Bissell and Karn) submittal of a crop management plan (attached).

Sincerely,

STEPHEN MORSE
Senior Water Quality Engineer

Attachment

RECEIVED

1981 SEP 10 AM 10:57

ALAMEDA COUNTY PLANNING
DEPARTMENT

chand

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

1111 JACKSON STREET, ROOM 6040
OAKLAND 94607

Phone: Area Code 415
464-1255



August 27, 1981
2199.9094(SIM)

Mr. Richard W. Karn
Bissell & Karn, Inc.
2551 Merced Street
San Leandro, CA 94577

Dear Mr. Karn:

Subject: "Feasibility Study of Effluent Irrigation Program for Proposed Northbluff Development"

We have reviewed the feasibility study submitted August 7 and find it does not satisfy our needs concerning the protection of water quality (i.e. nitrates) or protection of the public from waste water disposal (i.e. spraying).

The following were not at least conceptually answered in the report:

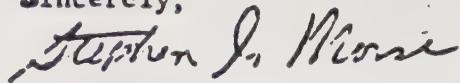
1. Will water quality be protected (i.e. nitrates) through crop management?
2. Will the soils allow continued use of reclaimed water?
3. Is the entire proposed disposal system economically viable to assure the Board of continued reliable operation?
4. What institutional arrangements are proposed for operation of the disposal system?
5. Are you or aren't you going to grow trees?
6. What are the Health Department's concerns with the proposals, especially the buffer zone trees irrigation and Christmas tree farming? (This subject has been asked of you several times and has not yet been resolved.)
7. Considering some of the unknowns expressed in the report and the time phasing of the project, are any experimental programs or operational schemes called for?
8. What about return flows during irrigation? runoff control?
9. Considering the time phasing of the building project, can and/or will the disposal project also be time phased?

...more

Mr. Richard W. Karn
page 2
August 27, 1981

I suggest you and Mr. McNeely meet with us so we can review the report and to define our concerns further on the above questions. Please call me (464-0681) when you are ready to meet.

Sincerely,



Stephen Morse
Senior Engineer

cc: Garry Lee
Bruce Fry
Mun Mar

"I think that the discussion of the closeness of the airport to the proposed Northbluff project would have more meaning to us if the discussion compared it to the closeness of housing to the airport in Livermore, contrasting their relationships to landing patterns and airplane's altitudes as well."

Comment: Nearest housing in Livermore is about 3,000' from the easterly end of the airport runway. However, this housing is much more affected than Northbluff housing would be because flight patterns generally run parallel to the runway (east-west), as shown in Figure 23 of the Draft EIR. Noise contours follow this east-west pattern and indicate that the projected 1995 65 CNEL zone will approach but not include Livermore residences, about 200' away. This zone would fall about 2,000' from nearest Northbluff residences.

L. Response of California Department of Transportation (Caltrans) District 4:

Caltrans remarks #1, 6, 7, 10 and 11 require no additional comment.

"Traffic Diagrams #5 and #6: The proposed additional lanes and new loop look feasible. The only drawback is the unsymmetrical interchange. However, for the small traffic volumes (30 AM and 210 PM), a new eastbound diagonal on-ramp to make it symmetrical probably could not be justified."

Comment: DKS Associates, traffic consultants for applicants, advises that purpose of abandonment of the eastbound I-580 on-ramp was to allow for more lanes on the overpass for the northbound direction. The design was discussed with Clarence Yee of Caltrans at a meeting 7/1/81. Mr Yee agreed with the general concept of deleting the loop off-ramp and providing an eastbound diagonal on-ramp. The existing loop off-ramp doesn't meet Caltrans current geometric design standards, hence, overall it was considered more desirable to provide an eastbound diagonal on-ramp.

"Traffic Diagrams #10 and #11: There are not enough lanes to handle the PM peak-hour volumes. The eastbound off-ramp should have a triple left turn instead of a double left. The northbound Airway Boulevard approach to the off-ramp and Airway Boulevard intersections should have three through lanes instead of two shown."

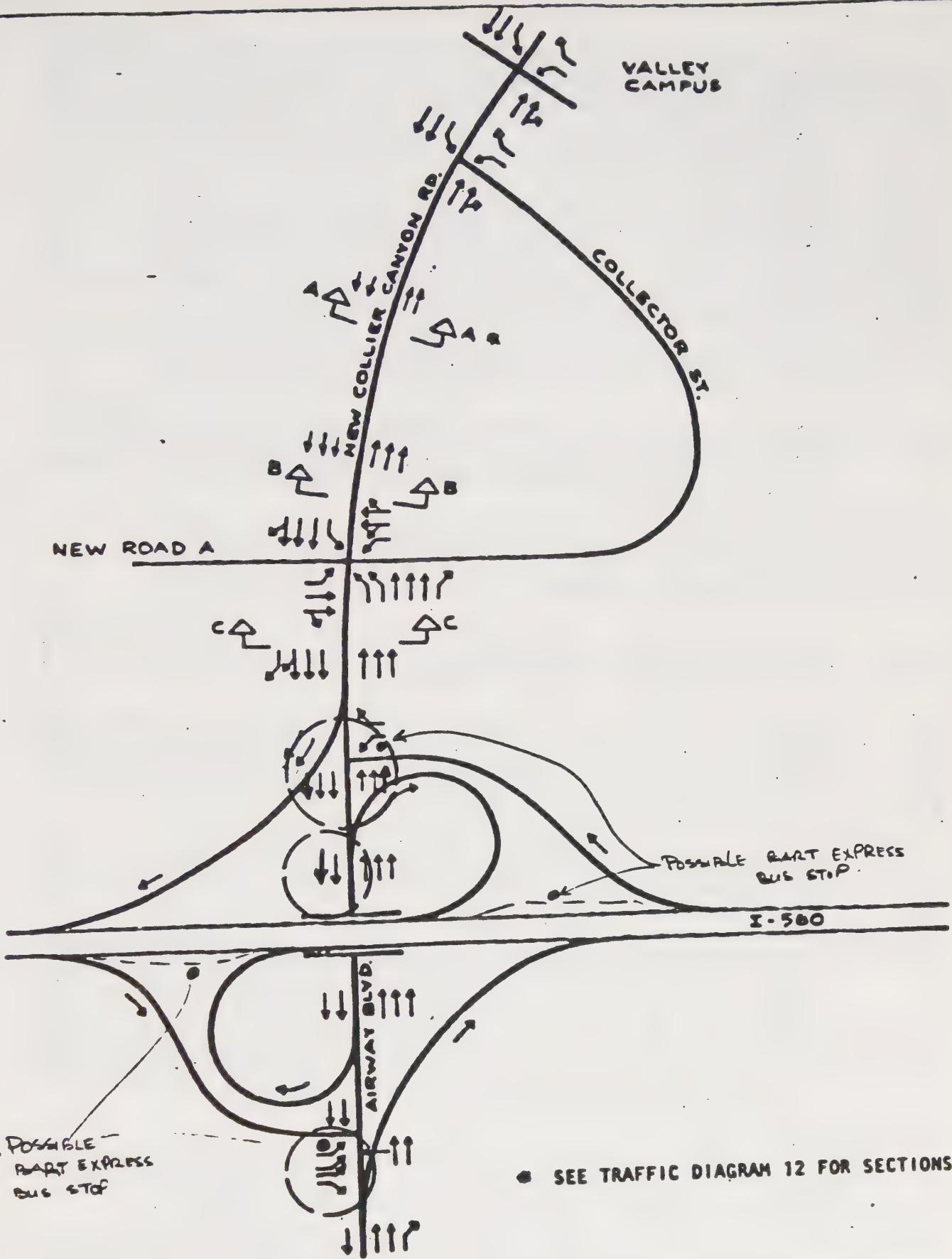
Comment: Three left turn lanes will be provided at the eastbound I-580 off-ramp and three northbound through lanes on Airway Boulevard will be provided. See revised Traffic Diagram 10.

"Southbound Airway Boulevard through the interchange needs only one lane, not two as shown on Traffic Diagram #10."

Comment: It is true from a traffic volume aspect that only one southbound travel lane on Airway Boulevard is required; however, for roadway geometric continuity and to minimize trapping southbound vehicles in the right turn lanes to westbound I-580, two through lanes are needed.

"DEIR, page 53: Project Developer should provide specific area for Car-pooling and Ride Sharing staging area within the Projected Local Commercial Area Parking Lot."

Comment: The Car-pooling and Ride Sharing staging area has been studied and will be provided in a Transportation Terminal as described in the new section entitled "Transit Impacts", Part II.D. of this Addendum.



TRAFFIC DIAGRAM 10
PROPOSED GEOMETRICS
FOR THE YEAR 2005



DEB Associates
Engineering Services

"The DEIR does not clearly describe the funding arrangements for the proposed additions to the State highway system. We will not finance any project-related mitigation measures. Any work within the State highway right-of-way needs to be adequately described; the work must be evaluated for possible significant environmental consequences, and such work will be subject to our encroachment permit process."

Comment: Local funding such as through an assessment district might have to be used to finance State highway improvements.

EIR text is hereby revised to show that state highway funding of proposed highway improvements is relatively unlikely.

All state highway improvements are subject to approval by Caltrans and must pass through their environmental review process.

"DEIR, page 5, It is not clear whether the "Urban infrastructure" is intended by the proponents to include parts of the (Inter-) State Highway System. It is therefore suggested that the EIR specifically address the funding mechanisms for these improvements."

Comment: See response to previous comment.

M. Response of Wilsey & Ham:

"The trip generation factor assigned to Las Positas, 9 trip-ends per unit day...appears to be over-estimated for a development, like Las Positas, with a high percentage of multi-family residential units."

Comment: DKS was requested by the County to include Las Positas in their study in order to evaluate the cumulative impacts of other possible developments in the area. The purpose of this was to identify the right-of-way width of New Collier Canyon Road necessary to accommodate future growth in the area.

The traffic generation for Las Positas is therefore only as to the nature and size of Las Positas. Such estimates would of course be further refined in Las Positas' own EIR.

The trip generation rate of 9 trip ends per unit per day is an average rate; the rates for apartments to single family dwelling units vary from 6 to 12 trips ends. Since DKS did not know the mixture of types of housing units, the average trip rate was chosen. The task of estimating the total trips for Las Positas was mandated by the County of Alameda as described on pages 55-57. If a lower trip rate were used, the conclusions would not change significantly. The total trips generated by Las Positas is so great that a unit change in the rates will have virtually no effect on the impacts in general.

"The Northbluff analysis appears to neglect any effect of transit usage for Las Positas. As public transit will be an important component of our development plan, this could have a significant effect on the traffic analysis."

Comment: The Las Positas traffic impacts and transit potential can only be crudely estimated at this time until more definite plans for the development become available. When exact plans for transit service to Las Positas become available, then a more refined estimate of transit use and trip generation can be made.

The trip generation rate (9 vehicle trip ends per day) used for Las Positas as an average rate based upon an average housing mix and already assumed that there will be some bus service to the project. More frequent and extensive transit service would reduce the vehicle trip rate further.

There is a limit though to how much auto trips can be reduced by increased transit service. Studies such as "The Livermore-Pleasanton BART Extension Study-Final Report" have demonstrated that a significant reduction in vehicular trips will occur only if a high capacity transit mode such as a BART line is provided. The Livermore-BART extension study estimated that vehicle trips could be reduced by a maximum of 32 percent only if a BART extension ran to Las Positas and a special station were built for the development. While the extension of BART may still eventually occur, the Las Positas station has already been rejected by BART.

An Express busway on I-580 might reduce vehicle trip generation by 20 percent according to this same study but Las Positas must have direct express bus service for the maximum reduction to occur.

Studies of trips made in existing BART service corridors indicate that BART captures from 10 percent to 20 percent of the home-to-work trips in these corridors. BART express bus service captures only 11 percent of the home-work trip market on the average (BART Impact Program, 1977 Work Travel Survey).

The impacts of RIDEO local bus service on auto trip generation would be an order of magnitude less than the above figures for BART.

"The Northbluff report concludes (see pages 58-59, and page 61) that interchange improvements at I-580 and Portola Avenue will be required with Las Positas in order to mitigate the impact of the project on the Airway Boulevard interchange. We believe this finding is premature at this point because a system-wide analysis of the freeway interchanges connecting to Las Positas has not yet been prepared (this will be done as part of the Las Positas study). The Portola Avenue interchange would not need to provide access to Las Positas unless the other interchanges to the east are also projected to reach capacity. Even if capacity conditions are projected for these other interchanges, it may be more cost-effective to upgrade interchanges other than the one at Portola Avenue (existing topography may be one of the factors which preclude the upgrading of this interchange).

We suggest that any specific recommendations for interchange improvements needed for the Las Positas development be deleted from the Northbluff EIR. The impacts and necessary mitigation measures resulting from Las Positas will be identified in our forthcoming analysis."

Comment: We generally concur. The Northbluff EIR's conclusions on Las Positas should not govern that proposal. It is true that detailed analysis will need to be done to analyse the impacts of Las Positas. The improvement of the Portola Interchange was identified in this preliminary analysis, because this interchange was the most likely alternative access to and from I-580 other than Airway Boulevard. The cost effectiveness of improving the Portola interchange still needs to be evaluated.

- N. Response of the League of Women Voters of Livermore-Amador Valley:
No comment on their response appears necessary.

O. Response of Mr. and Mrs. Carl F. West:

"Why would the County let a residential development be built in an area which is better suited for agriculture or small farms? There are other areas in and around the City of Livermore that are better suited for this type of residential development, where major services would be better provided on the south side of Highway 580."

Comment: The County Board of Supervisors designated the site for residential use in the Livermore-Amador Valley Planning Unit General Plan Amendment in 1977. That Plan went through a long public hearing process and the residential designation was an outcome of that process. Designation for residential is not an entitlement for the property owner; such entitlement is the subject of the present rezoning application.

The West's other remarks give their opinions about the project and are not addressed to the Draft EIR.

P. Response of Zone 7, Alameda County Flood Control and Water Conservation District

"Improvement to Collier Canyon Creek required by Zone 7 would normally be done under agreement with the developer and the resultant channel would thereafter be maintained by Zone 7."

Comment: The clarification is hereby made a part of the Final EIR.

"...we wish to support the recommended requirement of an erosion and sediment control plan and related measures proposed in the EIR."

Comment: No comment appears necessary.

"The proposal of the Northbluff developer to provide a discrete sewerage system..., in concept, conforms to an interim standard of our agency...While this may be a feasible approach to deal with the sewerage problem..., it is but a third choice to handle sewage in the valley in the opinion of our consultant.... Their interim report...strongly advised that sewage from Livermore Valley could best be handled by exportation...via pipeline...(which) would more effectively remove salts from the valley, use less energy when compared to demineralization, and would be more reliable...Accordingly, we concur with the DEIR (page 68) that consideration be given to await our wastewater management study result before commitment is made on the proposed sewerage plan so that the alternatives...under investigation could be fully explored and conclusions reached as to the best solution from a valley-wide standpoint."

Comment: No additional comment appears necessary.

Q. Response of the Airport Land Use Commission:

"The Draft EIR should be revised to identify ALUC responsibilities and policies."

Comment: The following is hereby added to III.D.7. of the EIR (Public Plans and Policies):

AIRPORT LAND USE COMMISSION
STAFF REPORT - MARCH 10, 1982

Determination of ALUC Plan Conformance: Proposed Northbluff Development, Livermore Municipal Airport General Referral Area.

Recommendation: It is recommended that the ALUC review and approve this staff report and transmit it together with Commission comments to the Alameda County Planning Commission.

Background: The proposed rezoning of the Northbluff property the ALUC's review for plan conformance, and the final EIR have been scheduled for Alameda County Planning Commission consideration at the March 15, 1982 meeting. At the January meeting, the ALUC reviewed the draft EIR and directed that comments be transmitted to the County Planning Department. At the February meeting, the ALUC reviewed the proposed project for conformance with the ALUC policies plan and requested additional information from the FAA and Livermore Airport Commission.

Project Description: The Broadmoor Development Corporation has requested rezoning of the subject property from Agricultural to a PD (Planned Development) District. The proposed project would include 1,750 residences and auxiliary commercial and public facilities on 260 acres of a 393 acre site. The southern boundary of the subject property is located approximately 2,500 feet due north of the Livermore Airport runway.

Summary of February 10, 1982 ALUC Meeting: The ALUC staff report was reviewed. The report recommended that the Commission find the proposed development in conformance with the adopted ALUC plan, subject to confirmation that the projected noise contours shown on Map XVIII of the ALUC plan are correct. Commissioner Perl referred to a proposed new parallel runway and stated that the impact and changed flight pattern should be considered. Chairman Klehs stated an interest in having staff check with the FAA prior to finalization of the staff report. Commissioner Watson favored a noise and navigation easement over the property and noted that, regardless of noise contours, a portion of the public would complain about aircraft noises. Michael Farley, representing the developer, presented a report that indicated the site would not be impacted by airport noise; that he did not want to grant a noise easement if it were not necessary based on technical criteria. Herman Ruth, one of the owners of the property, presented background information on the history of the project and Morrie Holmes, a real estate appraiser, commented that the proposed new parallel runway had been considered in the 1975 airport master plan. Mr. Farley inquired whether the Commission would reach a decision at the February meeting if he agreed to the noise easement. Commissioner Trautwein indicated that she favored a continuance for further study of safety issues as well as noise. The meeting was continued, with ALUC staff stating that the County Planning Commission would be informed that an ALUC recommendation would be forthcoming prior to the March 15th Planning Commission hearing.

Additional Information Requested by ALUC: In response to ALUC requests, the following information has been received by ALUC staff since the February meeting:

Livermore Airport Commission: In a letter dated February 26, 1982 signed by Elliott Dopking, Chairman, the Livermore Airport Commission advises the ALUC that it strongly recommends against approval of the Northbluff project, stating that the development would be exposed to airport noise and possible safety hazards resulting in complaints against the airport. The Airport Commission notes that a planned parallel runway will necessitate a traffic pattern which would mean a large number of aircraft flying over the Northbluff community.

ALUC Staff Communication with the FAA: In response to ALUC staff inquiry on February 26, 1982, Les Hopkins of the FAA stated that the planned parallel runway

and new traffic pattern at Livermore Airport were previously considered by the FAA when the agency approved the "airport layout plan." Mr. Hopkins also stated that the new Satellite Airport designation and program to install navigation equipment may result in more training activity than originally planned. However, neither the proposed new runway nor the Satellite Airport designation would alter the FAA's Determination of No Hazard regarding the Northbluff proposal. The Determination of No Hazard relates to a proposal's potential safety effects on aeronautical operations. The determination does not speak to the issue of noise. The FAA reiterated its concern with the potential noise problem, and stated that it "very much recommends an easement to permit a specified noise level and the right to fly over the property." The FAA also recommends acoustical treatment to insulate residences to an interior maximum of 45 dB noise level.

Analysis and Findings: The following findings are taken from the January, February, and current ALUC staff report:

- (1) The project site lies outside of adopted ALUC projected noise contours and safety zones; proposed construction is below adopted ALUC height limits.
- (2) ALUC policies concerning safety and noise only apply within adopted height, safety, and noise zones.
- (3) The adopted ALUC projected 1995 noise contours, taken from the 1975 Livermore Airport Master Plan, may need revision. In communications with ALUC staff, the FAA, the State Division of Aeronautics, and John Costas, one of the former consultants who prepared the noise contours, state that the Satellite Airport designation may increase the projected number of aircraft operations somewhat. August Compton, former consultant for the Livermore Airport Master Plan, noted in January, 1982 that the number of aircraft stationed at the airport is 25-30% higher than anticipated in the master plan; a trend which has been counterbalanced by the effects of increased fuel costs. ALUC staff note that the fuel cost outlook may be subject to substantial variations in the future. ALUC staff also note that no actual field measurements of noise levels have been taken at Livermore Airport. Dan Lee (by telephone, March 3, 1982), Livermore Director of Public Works, states that there are no plans to revise the 1975 master plan and that the noise contours depicted in that plan are essentially accurate.
- (4) Several members of the ALUC, and Dan Lee, Livermore Director of Public Works, state that noise complaints against the airport are likely even though the present official noise contours for 1995 in the ALUC plan do not extend over the proposed development. Complaints are expected in response to occasional single noise events. The noise impact is heightened by public sensitivity to having aircraft overhead.
- (5) A noise survey has been recommended by the State Division of Aeronautics (letter, April 14, 1981).
- (6) A noise and aviation easement has been recommended by the State Division of Aeronautics (letter, April 14, 1981) and by the FAA (communication, February 26, 1982). The draft EIR prepared by the County Planning Department states that a noise easement might lessen potential adverse impacts on the airport from future residents (p. 80). ALUC Policy 19 recommends that residents of noise exposure areas be notified of noise levels and of any land use restrictions associated with high noise exposure.
- (7) The FAA (communication, February 26, 1982) and the State Division of Aeronautics (letter, April 14, 1981) recommend that acoustic treatment be required of residences to assure that interior noise levels are 45 dB or below. The draft EIR states that increased insulation may not be justified because no official noise standards would be exceeded (p. 80). ALUC Policies 16 and 16.1 call for increased acoustical treatment for residences within a 53 CNEL contour.

STAFF REPORT - MARCH 10, 1982
PAGE THREE

Conclusions:

- (1) It is recommended that the Airport Land Use Commission find the proposed development to be in conformance with the adopted ALUC plan. This recommendation is based on Findings (1) and (2) above, that the project site lies outside of adopted ALUC noise and safety zones and that the proposed development would be constructed below adopted ALUC height limitations for Livermore Airport.
- (2) It is also recommended that the ALUC recommend that the Planning Commission consider requiring that the developer conduct a noise study in accord with Finding (5), the recommendation made by the State Division of Aeronautics on April 14, 1981.
- (3) In response to Findings (3) through (7) above, it is recommended that the ALUC discuss recommending County Planning Commission consideration of one or more of the following:
 - a. A noise and navigation easement for the subject property recommended by FAA and the State.
 - b. Placement of a notice in each property deed in the proposed development to notify property purchasers to the nearby presence of the airport and airport traffic pattern and possible resulting noise impacts.
 - c. Special acoustic treatment to assure acceptable interior noise levels recommended by FAA and the State.

The Alameda County Airport Land Use Commission (ALUC) is charged pursuant to State law to coordinate new development in the vicinity of airports and to make recommendations which, by promoting the compatibility of new development with existing and planned airport operations, will protect the welfare of nearby inhabitants and the general public. The ALUC is responsible for determining whether a proposed action by a public agency is in the best interest of the airport or adjacent area. If the Commission determines that the action would be harmful, then the public agency is to be notified and must hold another hearing to reconsider. The public agency can, however, over-rule the ALUC after such hearing by a four-fifths vote.

The ALUC has found the project to be in conformance with the adopted ALUC plan, subject to confirmation that the projected noise contours of the ALUC plan are correct. Further detail may be found in the ALUC Staff Report of March 10, 1982, included in this Addendum.

"...it is recommended that the Final EIR include a study of existing and projected aircraft noise on the subject property."

Comment: The Draft EIR mentioned that some noise impacts may occur due to occasional flyovers. There is no evidence that noise standards are exceeded on the site due to aircraft operations. Normal building techniques will reduce interior noise by 15 dB, more than adequate to achieve levels of 45 dB based on known noise contours and even assuming a tripling of previously projected 1995 contour. A noise study could be required of the developer as a condition of zoning approval, with suitable building techniques required, if an impact were demonstrated either from existing or projected noise levels.

"The issue of safety, hazards either to aircraft operations or future project residents, should be detailed."

Comment: The Draft EIR's reference to possible safety impacts was based simply on the project's proximity to the airport and the use of the airport by pilot trainees. The project has received a determination of No Hazard from the FAA, has been found to have maximum elevations below adopted height restrictions, and lies outside the ALUC's adopted Safety Zones. Refer to the ALUC Staff Report of March 10, 1982 (included in this Addendum) for further details.

R. Response of Bay Area Air Quality Management District:

The District appears to be noting that the mitigating assumption in the air quality analysis in the Draft EIR—that the project would generate less pollution than alternatives in which housing were built further from Valley employment—holds true only if the housing to be provided by the project is appropriate to serve that local employment. The Draft EIR noted this question (page 36-37) and the point is still valid. Unfortunately, since most of the new industrial/commercial development projected for the Valley is yet unbuilt, it is speculative almost to the point of uselessness to try to determine if the project's housing would meet the needs of the future employees. The proposed housing costs would probably be too great to meet the needs of low and moderate income homebuyers or renters. The proportion of such households within the anticipated new commercial, industrial, office, and warehouse developments is unknown. The quantitative analysis contained in the DEIR is based on standard VMT assumptions.

"The location of the sewage treatment plant in relation to housing should be discussed...A discussion of wind direction and worst case odors or H₂S, in case of upset conditions, should be included."

Comment: The Draft EIR discusses odors from the plant in relation to residences on pages 67-69. The plant is proposed to include latest state-of-the-art odor control equipment, including activated carbon filters and/or chemical scrubbers. Treatment processes which are potential generators of odors would be enclosed and ventilated with exhaust fans and odor control equipment. Generally odors are the result of septic, or an aerobic, conditions in a plant. The plant would be designed and operated to provide an adequate air supply to maintain aerobic conditions. The plant would include standby aeration equipment and its own electrical generator to supply emergency power. The extended aeration oxidation ditch is one of the most stable of all wastewater treatment processes. Limitation to domestic and minor commercial wastewaters will also help minimize potential for upset conditions.

"In Table 6 (page 29), a comparison is made between the number of days exceeding the .12 ppm standard and average high hour concentrations for ozone. The ozone standard was changed from .08 ppm to .12 ppm beginning with the 1978 reporting period, and the table should include this change."

Comment: Table 6 is hereby amended to add note: "Ozone standard was changed from .08 to .12 ppm in 1978."

"On page 31, dust emissions from construction are discussed. We feel that the worst case concentrations should be estimated, and a comparison with standards made to determine if the particulate standard will be exceeded in the project area."

Comment: As noted in the Draft EIR (page 27), EPA estimates a worst case dust generation factor from construction sites at 1.2 tons/acre/month. Project is planned to have a 5 year buildout with 234 acres of graded land and two months heavy grading time each year. Thus, 23.4 acres/month would be graded. Applying the EPA figure and converting to micrograms per cubic meter per day (the unit in which state and federal standards are expressed), yields a worst case dust concentration of 932 micrograms/cubic meter/day. Federal standard is 260; State standard is 100. Thus, site dust concentrations would be about four times the federal and nine times the State standard. However, this estimate is on-site, essentially at point of generation, and does not account for settling out of dust particles over distances. Actual concentrations off site would be less. The figures also do not take into account standard mitigation for dust control such as watering and paving. Subdivisions in Alameda County must meet performance controls regarding dust which require remedial measures to be taken if complaints are received.

S. Response of Alameda County Water District:

"The DEIR does not adequately address precedent-setting approval leading to a proliferation of small discrete sewage treatment and disposal systems in the watershed. Other similar development will be entitled to use similar systems if this proposal is approved. The cumulative potential for such development is obviously great when one views the potentially developable land within the Livermore-Amador Valley. There is no determination of the cumulative impacts which would result or mitigating measures to cope with the consequences of such proliferation."

Comment: Future development which may propose discrete sewage treatment and disposal systems is limited to areas shown for development on the Alameda County General Plan (excepting, of course, development within cities which may need discrete systems because of limited pipeline capacity). Such areas, if they are to develop, have little choice at present to meet their sewerage needs other than through new wastewater treatment plants. Such systems have been proposed in the past to serve unincorporated area development remote from existing sewer systems and will undoubtedly be proposed in the future. The precedent which may be set by Northbluff is not the utilization of a discrete system itself, but the conditions under which such a system would be approved and ultimately operated. In this regard, the system is being proposed and requirements would be made with the goal of minimal risk to water resources in mind. The system would have to be operated by a public agency responsible for its correct operation and maintenance, under both Regional Water Quality Control Board requirements and Alameda County policy. Each system proposed will have to meet these requirements as well as Zone 7 discharge requirements. The Northbluff system is designed to produce treated effluent for disposal which is of equal or higher quality than presently available domestic water. Similar systems in the Valley cumulatively would generate no significant impacts on downstream water quality. Risk of temporary system failure may be somewhat higher than conventional sewerage systems but impacts would probably be less than if a major system failed, due to much smaller scale of the discrete system. Major adverse impact of a proliferation of small systems would be proliferation of governmental agencies to operate and maintain them, which would tend to fragment water resource planning and coordination efforts in the Valley.

"The proposed sewage treatment and disposal system is very complicated...Experience with small sewage treatment systems is that they often are not properly operated or maintained and are thus unreliable. The DEIR doesn't assess this problem or propose mitigation measures within the context of the applicant's proposal."

Comment: It is true that operation and maintenance of an advanced waste treatment system, such as the proposed Northbluff Plant, requires highly skilled operators. As with any treatment facility regulated by the State, the ultimate responsibility for the facility's proper operation and maintenance lies with the local government and citizens. The estimates of staffing and operational and maintenance requirements for the proposed Northbluff Plan are based on the accepted levels for similar facilities. Annual operation and maintenance costs for this facility are estimated on this basis and would be the responsibility of the residents in the Northbluff service area. Both large and small plants can be subject to problems if they are not operated properly with an adequate budget for maintenance supplies. Proper management is a major factor in avoiding these problems.

The County Service Area (CSA), Community Service District (CSD), or other appropriate agency would be responsible for assuring reliability of the wastewater treatment and reclamation system.

"The dependability of a County Service Area (CSA) or Community Service District (CSD) in providing a proper level of service for these sophisticated systems is not evaluated either. The DEIR Erratum identifies the financial problems for the County that could result from system failures under with CSA or CSD management as various parties try to sort out the responsibility. What happens to the waste water from a malfunctioning system during this period?"

Comment: Either a CSD or CSA would have to be set up to provide a proper level of service with sufficient funding for contingencies as well. Under a CSD such as Dublin-San Ramon Services District or Alameda County Water District, the County would not be liable for system failures and the District would have the responsibility to correct problems. Quality of treatment and effluent discharge would be regulated by the San Francisco Bay Regional Water Quality Control Board, State Water Resources Control Board and Health Department. Under a CSA, the County would control the system and be responsible for any problems. An operating agency and program must be created for sewage treatment if the project is approved regardless of the type of wastewater management system proposed.

"Would a small CSA or CSD be able to afford adequately trained and experienced personnel to operate the system 25 years from now? Moreover, what would be the cumulative institutional impact resulting from creation of a number of such agencies?"

Comment: The CSA or CSD would have to establish a sound financial/revenue program in which resources were available for capital replacement and operation and maintenance. Of greater concern than the long term is potential problems in financing sewage treatment if the project is not built out as planned, in which case a small number of residents would be burdened with large sewage treatment (and other) costs.

Cumulative institutional impact of establishing a number of agencies to manage sewage treatment plants would be a further fragmentation of water resource planning and coordination efforts in the Valley. Overall reliability for a number of small decentralized systems would probably be greater than for one single system since the odds of simultaneous failure of a number of small systems would be much lower, and the effects on water quality less drastic, than for a single plant.

"...the District is opposed to any movement toward development of the unsewered areas outside the Livermore-Amador Valley Waste Water Management Agency service area before completion of the Zone 7 Waste Water Management Study. Until then, water quality impacts of discrete sewerage systems cannot be evaluated in comparison with other alternatives the study may find to be just as feasible or better."

Comment: We generally concur, as stated in the Draft EIR (page 68). The Zone 7 Wastewater Management Study is available in draft form and discusses options for management of wastewater from new development outside existing sewerage areas, including using individual demineralization facilities and construction of a new export pipeline. The Report does not note significant differences in ultimate water quality between these two alternatives, but does point out other advantages/disadvantages for each. Construction of a new export pipeline would take coordinated efforts of all Valley communities but is the most cost-effective method for discharges of over 3-4 mgd. It would be cheaper to operate and pose fewer technological or operational problems than reverse osmosis with land application of treated effluent, according to the Report. Refer to the Report for further details.

"The report does not discuss the effects of use nor mitigation for irrigation of soils with serious erosion potential..."

Comment: Purcell-Rhoades and Associates provide a number of recommendations to minimize the risk of erosion and effluent runoff from spray irrigation areas. Vegetation would be planted to control erosion of hillsides. Reclaimed water would be applied at controlled rates for effluent disposal and irrigation while at the same time minimizing surface runoff and erosion. The application rates could be reduced in those areas which exhibit any erosion symptoms. In addition, small earth dams could be built to contain any runoff. The runoff would then be pumped to the storage reservoir.

"The DEIR on page 18 states 'Land application of treated effluent also poses unknown water quality risks. The Sewage Disposal Section of the report discusses these potential problems in greater detail.' However, the 'water quality risks' are not discussed in the Sewage Disposal Section. The discussion of Impacts and Mitigation starting on page 63 refers to the problem only in general terms."

Comment: The Draft EIR states (page 67) that water quality impacts would be insignificant if the treatment system works as planned, but that impacts could occur if unanticipated problems develop. Obviously such impacts cannot be quantified but can be discussed only qualitatively at this time. Such a discussion in a "worst case" of system failure is presented in Section IV.K. (Comments on response of Sid Sutherland).

"On page 65, a discussion of design treatment plant effluent concludes with a statement implying that project approval before adoption of the Zone 7 Waste Water Management Plan is justified, because of the quality of the effluent. If so, this should be followed with a discussion of the predecisional impacts and mitigation thereof...Moreover...the relative financial impacts of the proposed system are not discussed."

Comment: No such implication can possibly be gleaned from the discussion on page 65, which clearly states that "project proponents" believes the system should be approved in advance of a basin-wide plant. The Draft EIR implies just the opposite, on page 68, that the basin-wide plan should be adopted first.

The Waste Water Management Plan contains information concerning relative facility/alternative costs. It is hereby incorporated by reference in this EIR.

"The proposed effluent disposal system envisions a complex spray irrigation system that would attempt to hold all of the wastewater and salts derived from wastewater on site, page 66. Discussion of salt buildup in the soils is limited to nitrates; accumulation of other salts is not discussed. If the wastewater and salts do not percolate as implied on page 9 in the discussion under Soils, Groundwater Conditions, and since the wastewater and salts cannot be allowed to run off as stated on page 66, then the salts will be concentrated in the surface zone of the spray application area. This will eventually render the spray area sterile for plant growth as a result of salt buildup. The DEIR does not discuss the salt buildup problem, a means of preventing it, nor an analysis of the eventual fate of the salts if the problem is somehow solved. Mitigation of the loss of plant cover on the disposal area should be determined in case the problem can't be solved."

Comment: No significant salts accumulation or deterioration of groundwater quality is anticipated with the proposed reverse osmosis facilities. The final effluent TDS would be equal to or lower than that of the local potable water supply. The waste brine from the system would be concentrated in sealed on-site evaporation ponds prior to being hauled to disposal in the East Bay Discharge Authority (EBDA) sewerage system.

"On page 67, the DEIR states of the sewage treatment system: 'If every component works as planned, water quality impacts would be insignificant'. This statement is not supported by analysis or long-term example, and should be deleted unless it is."

Comment: Operation as planned would yield treated wastewater of quality equal to or higher than locally available domestic water. Management of the system is proposed with the goal of producing no water quality impacts. Similar systems are currently in operation at Ramona Municipal Water District for San Diego Country Estates, at the El Dorado Irrigation District at Kirkwood Meadows, and at the Orange County Water District at Water Factory 21. These facilities include advanced waste treatment processes with reverse osmosis and have successfully operated for nearly 10 years.

"The DEIR on page 68 under Mitigation states: 'Consideration should be given to awaiting Zone 7's Waste Water Management Study results before commitment to any specific management arrangement so that alternatives to be explored by the Study are not curtailed by precedential action on this particular application'. ACWD believes that County is required by CEQA to wait for completion of the Zone 7 study or to otherwise analyze the cumulative impacts on water quality of the potential future developments that could use wastewater systems similar to the one proposed for this project. Even this assumes the Zone 7 study will sufficiently determine the results of a proliferation of similar discrete sewage systems; if it does not, an additional study would be required. The precedential nature of the project is also discussed in Unavoidable Adverse Impacts on page 110 and under Growth Inducing Impacts on pages 112 and 113. Nevertheless, there is no assessment of resulting cumulative impacts as required by California Administrative Code Section 15023.5(b)."

Comment: As noted earlier, precedence of a Northbluff sewage system would be limited. The County already has specific policies for dealing with proposals for discrete systems. Each application would be considered individually and if the Northbluff proposal is approved it may or may not have any precedential relevance to future proposals. At most, Northbluff may set a precedent as to type of management of the system.

Provision of a discrete sewerage system removes one (but by no means all) obstacle to development of areas distant from existing cities. Cumulative impacts would depend on details and amount of other proposed development and willingness of the County to amend the General Plan to allow still further development. Cumulative impacts would include deterioration of air quality, increased energy consumption, loss of open space, increased traffic. These impacts would occur from substantial new development in the Valley no matter how wastewater was managed.

As discussed previously in the Addendum, proliferation of small wastewater management systems would pose some risk to water quality. The failure of one small system would probably generate minor temporary water quality impacts. Simultaneous failure of a number of small systems is unlikely. Failure of one large system is not likely, but would possibly generate major temporary water quality impacts.

"Under Mitigation on page 69, the DEIR implies the availability of the Livermore wastewater plant for emergency use. The City of Livermore at the December 21, 1981 public hearing contradicted this saying its plant has no available capacity for such consideration. The sentence should be modified accordingly."

Comment: Use of the Livermore Treatment Plan on an emergency basis would only be available if agreement is reached between the proposed Northbluff development and the City of Livermore, and if the Livermore Plant's full capacity was not in use at that time. Some restrictions could also be placed on this type of arrangement by the San Francisco Bay Regional Water Quality Control Board.

"One additional alternative is available and should be evaluated. This would be project deferral until the Zone 7 Waste Water Management Study Plan for the Valley is completed."

Comment: The Draft EIR refers to this possibility as a mitigation measure, rather than an alternative (page 68). For example, the project could be approved subject to a condition requiring conformance with a Zone 7-adopted Plan or requiring that sewage treatment planning be reviewed at a set time period to determine whether some other system is preferable.

T. Response of City of Pleasanton:

"The EIR states that the application of consultant recommendations relating to control of erosion and effluent runoff from spray irrigation cannot be made because the disposal sites are not known (page 12). Because of the potential effects on water quality, disposal sites should be included for some analysis within the scope of this environmental document."

Comment: The DEIR also goes on to note that mitigation measures are available (e.g., construction of check dams in case of erosional runoff, specifying maximum slopes for disposal areas, etc.). We do not concur that analysis of every last detail of the proposed wastewater treatment system must be submitted and analyzed at this time. Conditions of approval, possibly even extending to include future supplemental environmental work, can be utilized to ensure mitigation of impacts.

"...the fact that treated effluent must be pumped to the 700 foot elevation (page 65) does create a great potential for operational problems, particularly pump failure, either mechanical or energy related. This potential should be discussed further and specific mitigation measures listed. For instance, given the unpredictability of such a failure, what flexibility is there to effect repairs?"

Comment: Backup power and other redundant systems proposed as part of the project will minimize the chances for component failure. If the pump were to fail, treated effluent could be placed into brine storage ponds if extra capacity were designed into the system.

"If there is a failure of the discrete system which would require installation of a public sewer system, what would be the magnitude of the costs to convert?"

Comment: The "discrete system" proposed would also be a "public sewer system". We presume the intent of this question is to ask what costs would be incurred by connection to an existing wastewater treatment facility. Connection to any other system would require enlargement of existing treatment facilities plus provisions for disposal of treated wastewater. In the case of Livermore, capacity in the existing LAVWMA pipeline or alternative disposal would also be required.

"The tables listed in this section (Transportation/Circulation) do not coordinate with the text."

Comment: See Section II.A. of this Addendum.

"This section contains an analysis of projected traffic levels in 2005 based on the assumption that the Las Positas community and other adjacent areas were to be developed. Although the intent of this assumption is understood, the "worst case" (page 43) situation may not be just limited to that scenario. In the case of the Northbluff project, the access capability, a critical factor in evaluating any development of this nature and size, is limited and must be analyzed independent of other projects which are being reviewed under separate application and scheduling. We do not say that the existing analysis is invalid. However, given phasing of projects and the potential for a variety of decisions regarding development in this area, we suggest that the EIR would be inadequate if further discussion of the relative "isolation" of the project site were not included."

Comment: Of course the worst case scenario is not the only one which may occur, but its analysis shows the greatest environmental impacts that might reasonably be expected to occur and thus is a reasonable basis for evaluating environmental impacts of the project. As stated in the DEIR, the project is relatively isolated from other residential developments and has a single primary access road. Applicant's traffic consultant and County Road Department have expressed no concerns regarding the single access road.

"The Collier Canyon Road/Interstate 580 interchange would appear to be the only major access to the site. In the event of road construction or emergency, this access may be limited or completely eliminated. Collier Canyon Road would be a limited, lengthy access from the north. A comparison to the Springtown area of Livermore shows at least three separate major routes which may be used for that area. Further analysis should include development under such conditions, schemes for additional circulation routes, and coordination of development phases (Northbluff) with road improvements."

Comment: This is a comment on the project design and not the DEIR.

For a project of this size it is typical to make the best use of existing facilities. Developer's traffic consultant's analysis indicates that the existing facilities with roadway improvements will provide sufficient capacity for all traffic including the Northbluff development. It is not cost-effective to provide an additional bridge across I-580 for the infrequent use of emergency vehicles and for use during roadway construction.

"Regardless of the status of BART, Livermore's RIDEO bus system, or future public and private efforts to secure transit services (page 53), the EIR does not discuss the impacts of the lack of a site for a transit-related facility in the proposed land use plan. Concerns relating to air quality, energy consumption, and single occupancy vehicle usage all highlight such a need because of the location of the project site to potential employment and commercial centers. The proximity to a freeway interchange should be emphasized. The site plan shows the transit stop with surrounding areas committed to a park and residential units. The EIR should recognize the impacts of the precedent-setting nature of such development as it relates to transportation-related mitigation measures."

Comment: The impact on the RIDEO transit service of the development will be a slight increase in ridership. The operation of RIDEO will not be affected. There will be a benefit to the RIDEO operations with realignment of New

Collier Canyon Road. A description of the existing service of RIDEO and BART express is presented in the new Section II.D. entitled "Transit Impacts", which also proposed a Transportation Terminal northeast of the freeway interchange to include a Park and Ride lot, Carpool and Ride Share staging area, drop-off and pickup area, and a bus shelter for RIDEO and BART express busses.

"We cannot agree that past development north of Interstate 580 in the Livermore area tends to reduce the significance of interruption of open space (page 76)...Because of the scenic qualities of the surrounding hills and mountain views to the entire valley and all who pass through, the scope of this section should be expanded to include an analysis of viewshed impacts from adjacent properties and the valley floor..."

Comment: The Draft EIR did not intend to underestimate the visual impact of the project. The report noted that the landscape would be transformed from its present pastoral open space character to a suburban landscape similar to Dublin. We believe that that description enables a clear image of the visual impacts to be formed, at least as well as any rendering or other graphic presentation. We believe, as stated in the DEIR, that aesthetic impacts will be adverse, particularly due to grading up into the hilly areas and certainly for existing residents of the area. Much of the impacts on more distant views can be mitigated through modifications of the grading plans, landscaping, etc. Impacts on nearby residents would remain but would be dwarfed by other impacts of the project.

"The park site is located adjacent to the freeway interchange and "entrance" to the project site where park users would be subjected to noise and vehicle exhausts. The impacts affecting this park function have not been adequately addressed in the EIR."

Comment: As indicated in the Air Quality Section of the DEIR, carbon monoxide standards would not be exceeded anywhere within the project. Hydrocarbon and nitrogen dioxide standards would be exceeded only near I-580. Noise discussion in the DEIR on pages 78-79 applies to the park site; it is calculated that "Normally Acceptable" noise exposure will prevail at the park site. It should be noted that the park is proposed to provide active recreation at this location, including playing fields, which are less noise-sensitive.

"An option which might be examined is locating the park adjacent to the proposed school site."

Comment: In terms of efficiency and noise considerations, major park facilities should be considered adjacent to the school, and the two facilities perhaps more centrally located (see page 70 of the Draft EIR).

The remainder of the City's remarks set forth its positions on aspects of the project. No further comments appear necessary.

U. Response of Alameda County Health Care Services Agency:

The Agency's response sets forth their position on sewage, water, and solid waste disposal services for the project. No comments appear necessary.

V. Response of the Alameda County Administrator:

General questions were raised by the County Administrator regarding revenue and cost projections, and phasing of service extensions. These questions had been based on a review of the EIR only, rather than on a review of the fiscal consultant's detailed fiscal impact studies dated April 1981 and January 1982. They have now been answered to the satisfaction of the County Administrator's representative Tracy Gomes, as confirmed by telephone with Mr. Gomes.

Two additional concerns were raised during an April 16, 1982 meeting with Mr. Gomes.

County Vulnerability To Future Events. The fiscal consultant's public services plan and cost/revenue analysis assumes that utilities and other infrastructure will be provided at no cost to the County, and noted that this capital cost could be financed in a number of ways, including development fees, homeowners' fees or special assessment districts. Mr. Gomes asked about County financial exposure if the Northbluff development did not proceed beyond an initial phase.

Failure to develop to the extent indicated in the Northbluff Master Plan would, in the absence of appropriate precautions, have serious impacts on the financial future of Northbluff. A lack of development would eliminate both development fees and homeowners' fees.

A special assessment proceeding would produce financing, at the start, for the full estimated cost of improvements. Further, the benefitted properties in the assessment district are solely liable for the assessments or for debt service, if bonds were issued. (The Improvement Bond Act of 1915 provided for a Countywide property tax levy of up to \$0.10 per \$100 of assessed value, in the event of a default. This levy was effectively eliminated by Proposition 13.) Nonetheless, a default on special assessment debt could have, or could be perceived to have, a negative effect on the financial community's attitude about all types of bonded debt used in Alameda County.

In practice, the County can avoid the risks of the market place by

- o requiring that improvements be in place and paid for before the approval process is complete.
- o requiring that improvements be installed and financed in logical, self-contained phases so that payment (or repayment) for one phase does not require completion of later phases.
- o requiring enforceable performance guarantees (e.g., a performance bond or a bank letter of credit) if there is a reasonable risk of non-performance.

There is adequate authority and opportunity for the County to impose precautions of the type listed above. These conditions can be imposed during the process of reviewing the subdivision map.

Community Services District. The fiscal analysis assumed that a County Service Area (CSA) would be used to provide augmented urban services at Northbluff. We understood that a CSA was Alameda County's preferred

governmental mechanism if urban services were to be provided in unincorporated areas. Mr. Gomes asked our opinion regarding use of a Community Services District (CSD) instead of a CSA.

In fact, a CSD is a very flexible, effective governmental mechanism to provide urban services. CSD's can be empowered to provide all the urban services that are at issue at Northbluff, including augmented law enforcement. The County and LAFCO might conclude, after further consideration, that certain features of a CSD are quite attractive. (One possible example is governance by locally elected Directors, rather than causing the Board of Supervisors to be responsible for services in an urban area.) A CSD could also implement a "public safety department" staffed with sworn police officers who are fully cross-trained as fire fighters.

W. Response of the State Clearinghouse:

Department of Health Services:

"...one area of potential concern lies with the generation of aerosols from spray disposal of treated wastewater. The wind direction analysis (Fig. 19) indicated that the project would be subject, approximately 25% of the time, to northerly winds. These winds could lead to aerosol drift from the spray area, across the 300 foot buffer zone, and onto residential property and public areas. The final EIR should include a wind rose that incorporates velocities."

Comment: California Administrative Code, Title 22, establishes regulations regarding wastewater reuse, which incorporates the concerns for aerosols. Proposed project would provide treatment and application in accordance with Title 22. The degree of treatment proposed would be applicable for spray irrigation for parks, playgrounds, and school yards, but only pasture irrigation is proposed at this time. The buffer area may be planted with trees to separate and intercept aerosols. In case of exceptionally windy conditions, spraying could be halted temporarily.

Accompanying tables present wind speed information taken at Livermore Airport in 1970-71.

Department of Transportation:

Caltrans' response to the DEIR was transmitted previous to State Clearinghouse comments and is found at Section IV.L. of the Addendum.

WIND ROSE - Livermore Airport

WINTER WIND December 1970, January and February, 1971 Morning (6-9 A.M.)

Direction	<u>Velocity, MPH</u>			<u>Average Velocity</u>	<u>% Total</u>
	0-3	4-7	8-12		
N	26	10	2	3.0	12
NE	21	7	0	2.5	8
E	79	14	0	2.1	28.9
SE	24	5	1	2.5	9.4
S	18	10	1	3.2	9.1
SW	25	23	4	3.9	16.2
W	26	4	1	2.3	9.7
NW	16	1	2	2.6	5.8
Calm	12				

Afternoon (4-6 P.M.)

N	7	2	4	4.7	5.4
NE	19	7	0	2.6	10.9
E	70	10	0	2.0	33.3
SE	4	0	0	1.5	1.7
S	21	14	4	3.8	16.4
SW	13	23	7	5.0	18.1
W	14	10	1	3.4	10.5
NW	5	3	1	3.8	3.8
Calm	2				

SUMMER WIND June, July, and August 1971

Morning (6-9 A.M.)

Direction	<u>Velocity MPH</u>				<u>Average Velocity</u>	<u>% Total</u>
	0-3	4-7	8-12	13-18		
N	0	0	0	0	0	0
NE	2	0	0	0	1.5	.6
E	1	0	0	0	1.5	.3
SE	4	0	0	0	1.5	1.1
S	0	1	0	0	5.5	.3
SW	146	132	28	1.	4.0	83.4
W	18	21	3	0	4.1	11.4
NW	9	2	0	0	2.2	3.1
Calm	12					

Afternoon (4-6 P.M.)

N	0	0	0	0	0	0
NE	0	0	0	0	0	0
E	0	0	0	0	0	0
SE	0	1	0	0	5.5	.4
S	0	1	5	0	9.2	2.2
SW	0	22	85	5	9.4	40.6
W	0	12	128	16	10.2	56.5
NW	0	1	0	0	5.5	.4
Calm	0					

V. RESPONSES TO THE DRAFT EIR GIVEN AT PLANNING COMMISSION HEARINGS OF DECEMBER 21, 1981, JANUARY 4, 1982, AND FEBRUARY 1, 1982

HEARING OF DECEMBER 21, 1981 (Refer to Minutes):

Mr. Saylor, General Manager of Alameda County Water District:

"...they believe that the EIR is inadequate in assessing the following impacts:

- (1) Reliability of the proposed sewerage system; feasibility of CSA or CSD for a small area
- (2) The consequences of setting a precedent in the approval of this project which would lead to a proliferation of discrete sewerage treatment plants
- (3) Obstruction of carrying out Zone 7's Wastewater Management Plan.

He said that they believe that the sewer system proposed is quite complicated and involved and there is no provision for major malfunction....He then spoke of the possibility of insufficient funding to correct malfunctioning. He also indicated that if the County is to underwrite or not underwrite a major malfunction, the EIR should deal with that question. He...noted that the EIR refers to cumulative impacts but does not detail the cumulative effects. He noted that the EIR does not mention the potential impact on the County of underwriting all such developments or what the environmental impacts would be. He also noted that the future of the Zone 7 Wastewater Improvement Plan is not assessed...He urged the Commission to direct a redraft of the EIR and continue the hearing until the redraft is complete."

Comment: Mr. Saylor's remarks are substantially the same as presented in the January 14, 1982 letter from ACWD, included and commented upon elsewhere in this Addendum.

Mr. Rhodes, attorney for Alameda County Water District:

"He...noted that the EIR does not address who will monitor the operation."

Comment: No formal proposal regarding monitoring has been put forth by the developer. One possibility is that Zone 7 would carryout monitoring under contract to a Northbluff CSA or CSD.

"He believed that the action of approving this matter is premature as this is an incomplete EIR, the details are not stated, it merely says that we will have to look further into other problems."

Comment: It is hoped that this Addendum provides sufficient further detail to permit knowledge by decision-makers of probable environmental effects and mitigation measures. The project is a rezoning only, not an entitlement to subdivide, and conditions can be placed through the Planned Development process to mitigate environmental impacts even though the exact nature of mitigation may not be known at this time.

Mr. Steve Deven (Deven property, 100 acres to the west of the site):

"He noted that there is no development on the west side of the interchange and wondered if the plan is to change the access to the left."

Comment: As shown in the Draft EIR, Figure 4, Collier Canyon Road is proposed to be realigned to connect with Doolan Canyon Road about 1,000' north of I-580; existing Collier Canyon Road east of Doolan Canyon Road (now essentially a frontage road) would be abandoned.

"He also spoke concerning the spraying of the effluent and asked if any consideration has been given to the adjacent property owners under the plant."

Comment: Refer to Section III.C. of this Addendum (Comments on the response of Mr. and Mrs. Carl West) for discussion of this matter.

"He also questioned the statement that the subject property is planned for residential as this is an agricultural area."

Comment: The site was designated for residential development before 1995, subject to other policies, in the Livermore-Amador Valley General Plan, adopted November, 1977. Surrounding properties were left in agricultural designation.

Commissioner Shirley Douglas:

"...was concerned with the housing mix proposed and noted that the alternative of low and moderate income housing is not addressed in the alternative section of the report. She felt that it should be addressed and expanded upon in some detail..."

Comment: Low and moderate income housing would be feasible financially for only a fraction of the units proposed without subsidy of some sort. The project as proposed would have high capital costs due to the need to provide all urban infrastructure and high on-going charges to homeowners (almost \$150/month). A decent mixture of housing is proposed, with an emphasis on higher density attached units, but total costs of buying and owning a home at Northbluff would be relatively high. The site is distant from shopping, schools, and employment areas and is poorly served by transit; at least one car would be imperative for any household in the project. From an economic standpoint for both project and low/moderate income household, the site is not well suited for such housing. A site closer to trip destinations, with services already available so that extra charges and fees would not be needed, would be preferable.

"She also noted that there was discussion by the applicant of the need for this project as evidenced by the market report; if there is a need or this housing, by the time this housing is built it will be more suitable for higher income residents, she requested more justification for the type of housing proposed. She also noted that on page 36 it is mentioned that housing is proposed to augment housing for new employment opportunities in the Valley, but it doesn't go into detail as to the type of employment planned..."

Comment: Market report indicated a need for housing in the Valley based on enormous business park potential. Pleasanton alone plans 1,200 acres of business parks which could generate 75,000 jobs over the next 20-25 years. Of course, there is no way of predicting the actual buildout rate of this development and thus the actual timing of housing needs. Unfortunately, there is also no way to predict with confidence the type of employment in the business parks (which would enable the need for various types of housing to be estimated), because most are not yet built or even approved and specific business uses are not known at this time.

"She was also of the opinion that the cumulative effects of the development of this proposal and Las Positas should be addressed..."

Comment: At the time of writing of the EIR, an application had not been submitted for Las Positas; its development was speculative and was included in the Traffic Section only to avoid foreclosing possible future needed right-of-way of Collier Canyon Road. In almost every respect, impacts of Las Positas, which proposes over 10 times the number of housing units as Northbluff, would dominate impacts of Northbluff, and the impacts of both together would not be significantly greater than Las Positas alone. The primary exception is the possible impact of further governmental fragmentation depending upon how Northbluff services will be managed.

"She.. noted that the report does not deal in depth with regard to the County's, financial liability should the system fail, and if it were to be under construction and there are financial problems would the County be responsible for completing the construction of the project."

Comment: Refer to IV.V. comments on response of Alameda County Administrator.

"Chairman Douglas also asked why federal dollars are included in the fiscal analysis."

Comment: Revenue sharing income to the County was included as part of County General Fund revenue, allocated toward the project on a Countywide average basis. Continuation of the program is uncertain, but the total amount allocated to the project is too small to significantly affect conclusions of the fiscal analysis.

HEARING OF JANUARY 4, 1982 (Refer to Minutes):

Carl West: His comments were submitted in writing and have been responded to in Section IV.C. and IV.O. of this Addendum.

Commissioner Spiliotopoulos: requested that the staff prepare a comparative table of the cost of services under the CSA as opposed to a municipal operation such as Pleasanton.

Comment: Applicant's fiscal consultant has submitted the following figures for annual cost per household for Northbluff vs. City of Livermore averages:

Type of Fee	Northbluff	Livermore Citywide Average
Water fees	\$ 140	\$ 37
Sewage Disposal Fees	420	50
Solid Waste	60	60
Fire Protection Special Tax	134	0
Homeowners Association		
Recreational Facilities	900	900
Median and common area maintenance	300	0
TOTAL	\$1924	\$1047
Property Tax	947	470
	\$2871	\$1517

Ongoing fees to Northbluff residents would be almost double average such costs to Livermore residents. Property tax would be greater because of assessment at the sale cost (pursuant to Proposition 13) for Northbluff, while Livermore's older housing stock, which hasn't all turned over since Proposition 13, reduces the average city assessed value. On a monthly basis, the Northbluff homeowner will have about \$160 in fees and charges, not including house payments or property taxes.

HEARING OF FEBRUARY 1, 1982 (Refer to Minutes):

Commissioner Shockley: noted that in the EIR it was stated that it was inefficient to build outside the City of Livermore. She asked if Broadmoor could come in with information of construction based on the criteria of infill with municipal and all services presently available at the time of construction, or building and providing all services from scratch.

Comment: It is very difficult to meaningfully compare development costs per unit. As a practical matter, there are very few, if any, developable infill areas large enough to accommodate 1,750 units. It would be more reasonable to consider the alternative as developing scattered infill units throughout a city totalling 1,750. Another difficulty in comparing development costs is the large number of different factors, such as the price of land and City connection fees, which must be considered. Thus, the following discussion should be noted with these caveats as well as the knowledge that strict comparisons are virtually impossible.

The primary differences between developing Northbluff and an infill site are the cost of certain "off-tract" improvements, such as modifications to I-580 freeway interchange, construction of a school, fire station, reservoir, and sewage treatment system, and improvement of parks. These costs are summarized below:

Freeway Improvement Costs	\$1,100,000	\$629/unit
School Cost	1,500,000	857/unit
Fire Station Costs	250,000	143/unit
Sewage Treatment System Costs	5,285,000	3020/unit
Park Improvement Costs	600,000	343/unit
Water Storage Tank Cost	<u>280,000</u>	<u>160/unit</u>
TOTALS	\$9,015,000	\$3152/unit

Some of these "extraordinary" costs would be offset by various connection fees within cities. In Livermore, for example, sewer hookup is \$2,045 per single family dwelling unit, \$2,045 for the first 8 fixtures, \$256 each additional for multiple units. Park requirements are 2 acres/100 lots or \$726/unit. Water connection fees are \$507 per single family residence or \$0.11/square foot building floor area for multiples.

OTHER PUBLIC TESTIMONY RELATES TO THE PROJECT ITSELF AND NOT THE EIR.



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